



United States Attorney
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April 13, 2020

BY EMAIL AND ECF

Brian Heberlig
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Re: *United States v. Ali Sadr Hashemi Nejad, 18 Cr. 224 (AJN)*

Dear Mr. Heberlig:

We write in response to your letter dated April 1, 2020 requesting further information about the Government's interviews of Bahram Karimi, and the events surrounding the Government's disclosure of the audio recording of the January 22, 2020 interview of Karimi (the "Recording").

Karimi lives in Canada. On June 16, 2016, Karimi was interviewed in Vancouver by two FBI Special Agents and two Assistant District Attorneys ("ADAs") from the New York County District Attorney's Office ("DANY"), including SAUSA Garrett Lynch. *See* Ex. A (FBI 302 Report of June 16, 2016 Karimi Interview previously produced as 3501-01) and Ex. B (Handwritten notes of June 16, 2016 Karimi Interview previously produced as 3501-02). On September 14, 2016, Karimi was interviewed again in Vancouver by an FBI Special Agent and an ADA from DANY. *See* Ex. C (FBI 302 Report of Sept. 14, 2016 Karimi Interview previously produced as 3501-06) and Ex. D (Handwritten notes of Sept. 14, 2016 Karimi Interview produced as 3501-03). An agent from the Royal Canadian Mounted Police ("RCMP") was present for both interviews.

During these 2016 interviews, Karimi provided the following information, in part, concerning the defendant, Mohammad Sadr (the defendant's father), and the Sadr entities: (1) Stratus was 100% owned and controlled by Mohammad Sadr; (2) the contract for the Venezuela project was awarded to the Iranian International Housing Company ("IIHC"), but this was in name only and it was really executed by Stratus; (3) the defendant was a member of the Venezuela Committee; (4) Mohammad Sadr made all of the important decisions with respect to the project; (5) IIHC enlisted the assistance of the Iranian government to help resolve issues that IIHC had with the Venezuelan government; (6) Stratus Turkey did not exist before the Venezuela project began and was sold after the project was suspended; and (7) the defendant was involved in managing project finances and payments.

Karimi also stated during the June 16, 2016 interview that “[e]veryone associated with Stratus and the project in Venezuela recognized the international sanctions placed on Iran but believed that circumventing those sanctions was a matter of survival” because Stratus “needed to be able to conduct business in U.S. dollars.” Ex. A at 5. Karimi explained that Stratus set up “entities in Turkey and Switzerland in order to receive payments in U.S. dollars,” that Clarity Trade and Finance was the Swiss entity created to receive payments from the Venezuela project, and that the defendant “was responsible for managing this part of the business and provided this information to Karimi via email.” Ex. A at 6. According to Karimi, the payment instructions included in the IIHC letters primarily came from the defendant. Ex. A at 6 and 9.

Based on these interviews, the Government attempted to secure Karimi’s cooperation as a trial witness against the defendant starting in or about May 2019. However, Karimi, through counsel, declined to travel to the United States to be interviewed, despite assurances of safe passage. On January 22, 2020, AUSAs Kim and Krouse interviewed Karimi in Vancouver. *See* Ex. E (Handwritten notes of the Jan. 22, 2020 Karimi interview previously produced as 3501-05). Also present for the interview were Joseph Saulnier (Karimi’s attorney), Special Agents Leigh Ann Pond and Robert DePresco (the FBI case agents), a Farsi interpreter, and an agent from the RCMP. The RCMP agent informed everyone present that she would be recording the interview.

During the January 2020 interview, Karimi made several statements that were consistent with his statements in the 2016 interviews, including that Mohammad Sadr controlled Stratus and IIHC, *see* Ex. E at 4; that the defendant was the financial manager on the Venezuela project, *id.* at 6; and that the defendant was responsible for collecting the payments for the project, *id.* However, Karimi contradicted his prior statement regarding Iran sanctions. Whereas Karimi said during the June 2016 interview that “[e]veryone associated with Stratus and the project in Venezuela recognized the international sanctions placed on Iran but believed that circumventing those sanctions was a matter of survival” because Stratus “needed to be able to conduct business in U.S. dollars,” Ex. A at 5, he stated during his 2020 interview that he “did not think private companies or people were subject to sanctions,” Ex. E at 6. AUSA Krouse memorialized Karimi’s statements in notes that he took during the meeting, *see* Ex. E, which were disclosed to the defense on February 5 as described below.

On January 23, 2020, the RCMP agent who had recorded the January 2020 interview sent an email to AUSAs Kim and Krouse, Special Agents Pond and DePresco, and Ann Miller, the FBI Assistant Legal Attaché (“LEGAT”) at the United States Consulate in Vancouver, asking whether the Government wanted a copy of the Recording. *See* Ex. F at 3. Special Agent Pond asked for a copy of the Recording and provided the address for the FBI’s main office in New York. *Id.* The LEGAT responded and offered to have the RCMP agent give the LEGAT a copy of the Recording, “[i]f it is easier,” and the LEGAT wrote that she could then “send [the Recording] to New York.” *Id.* at 2. The RCMP agent responded that she would “courier the dvd statement to your office in Vancouver.” *Id.*

On January 30, 2020, the Government publicly indicted Karimi. Count Three of the indictment charged Karimi, under Title 18, United States Code, Section 1001, with making the

following false statement: “during the course of the Venezuela Project, KARIMI believed that international sanctions against Iran did not apply to Iranian companies or persons.”

On February 3, 2020, Brian Heberlig sent a letter to AUSAs Kim, Krouse, and Lake, and SAUSA Lynch, requesting Karimi’s witness statements. *See* Ex. G at 3-4. On February 4, AUSA Krouse responded that the Government would produce the requested materials pursuant to a protective order. *See id.* at 3. During the course of negotiations between the parties regarding the terms of the protective order, *see id.* at 1-3, AUSA Krouse separately emailed Special Agents Pond and DePresco on February 5, asking them to “confirm as soon as possible: 1) There is no 302 for the September 14, 2016 interview with Karimi[;] 2) There is no 302 for the January 22, 2020 interview with Karimi[;] 3) There are no audio recordings of the interviews in June or September of 2016[;] 4) We have not yet received the audio recording of the January 22, 2020 interview,” Ex. H at 2. On February 5, Special Agent Pond responded that there was an FBI 302 report for the September 14, 2016 interview. *See* Ex. H at 1. That same day, Matthew Truono, an Intelligence Analyst for the FBI, sent AUSA Krouse the FBI 302 reports for the two 2016 interviews of Karimi. *See* Ex. I. Special Agent Pond also confirmed that there was no FBI 302 report for the January 22, 2020 interview. *See* Ex. H at 1. Regarding any recordings of the two 2016 interviews, Special Agent Pond responded, “[w]e don’t have recordings. RCMP probably does.” *Id.* Finally, Special Agent Pond “confirmed” AUSA Krouse’s understanding that FBI New York had “not yet received the audio recording for the January 22, 2020 interview with Karimi.” *Id.* In subsequent emails on February 5, AUSA Krouse requested from the FBI any recordings of the 2016 interviews of Karimi, and Special Agent Pond responded based on conversations with FBI agents previously assigned to the case that the 2016 interviews had not been recorded.¹ *See id.*

Later on February 5, 2020, AUSA Krouse emailed to the defense: (1) the notes and FBI 302 report of the June 2016 interview, (2) the notes and FBI 302 report of the September 2016 interview, (3) the notes of the January 2020 interview; and (4) notes from a call between Special Agent Pond and AUSAs Lake and Kim with Karimi on October 21, 2019, *see* Ex. J (previously produced as 3501-04). *See* Ex. G at 1 (attaching Exs. A-E, J). AUSA Krouse wrote in the email: “The third interview (on January 22, 2020) was recorded,” and continued—inaccurately, but based on his personal understanding at the time—“but RCMP has not yet provided us with a copy.” *Id.*

On February 6, 2020, Special Agent DePresco sent an email to the RCMP agent—copying the LEGAT and Special Agent Pond—asking the RCMP agent “to check and see if there are recordings available from the previous interviews that took place with Karimi on September 14, 2016 and June 16, 2016.” Ex. F at 2. The LEGAT responded to the email that she had “the recordings from the interview on Jan 22nd,” *i.e.*, the Recording, and asked for the address to “FedEx it to you guys.” *Id.* at 1. Special Agent DePresco provided an address, and the LEGAT replied, “I just got it Tuesday [February 4] as the one [the RCMP Agent] had sent over to my office never made it.” *Id.* Prior to the LEGAT’s February 6 email, Special Agents DePresco and Pond were unaware that the LEGAT had received the Recording from the RCMP.

¹ SAUSA Lynch, who participated in the June 16, 2016 interview of Karimi, also does not recall the interview being recorded.

On February 7, 2020, the LEGAT placed an entry into the FBI's electronic case management system, which said that the LEGAT obtained a copy of the Recording from the RCMP agent on February 4, 2020.

On February 7, 2020, the LEGAT sent the Recording to the FBI New York office via FedEx. *See* Ex. K at 2. On February 11, 2020, the FedEx package containing the Recording was delivered to the FBI Mail Room at 26 Federal Plaza, New York, NY. *Id.* On February 12, 2020, the FedEx package was retrieved from the FBI Mail Room and delivered to Special Agent Pond's desk. Special Agent Pond opened the FedEx package on February 12, 2020 and realized that it contained the Recording, but did not at that time inform the prosecutors or Special Agent DePresco.

On February 15, 2020, the RCMP agent responded to the February 6 request from Special Agent DePresco for any recordings of the 2016 interviews. Ex. L at 2-3. The RCMP agent instructed Special Agent DePresco to transmit the request to the RCMP's "Federal Police National Security" and the "Federal Policing Intake Unit." *Id.*

On February 18, 2020, Special Agent DePresco sent an email request for any recordings of the 2016 interviews of Karimi to the Canadian law enforcement components specified by the RCMP agent on February 15, copying AUSAs Krouse and Kim, Special Agent Pond, the LEGAT, the RCMP agent, and FBI supervisors. *See* Ex. M at 1-2. AUSA Krouse responded to Special Agent Depresco's email, copying AUSAs Kim and Lake: "What about the January 2020 meeting?"—referring to the Recording. *Id.* at 1. Special Agent DePresco responded— inaccurately but based on his personal understanding at the time—"It is in transit, still waiting for it." *Id.* AUSA Krouse understood the response to mean that the FBI was still waiting to receive the Recording from the RCMP, and assumed that Special Agents Pond and DePresco would notify the prosecutors when they received the Recording.²

Later on February 18, 2020, Special Agent DePresco learned that Special Agent Pond had already received the Recording. *See* Ex. L at 1. The FBI did not inform the prosecutors that FBI New York had received the Recording prior to March 30, 2020 as described below.

On February 21, 2020, JohnArthur Sgroi, a Supervisory Special Agent assigned to an FBI headquarters component, replied-all to Special Agent DePresco's February 18 request to the RCMP for any recordings of the 2016 Karimi interviews, offering assistance in responding to the request. *See* Ex. N.

² AUSA Krouse recalls asking Special Agent Pond about the status of the Recording around the time of the Karimi grand jury proceeding on January 30, 2020, and stating to Special Agent Pond that the prosecutors needed a copy of the Recording once the FBI received it. Special Agent Pond does not recall this conversation. AUSA Kim recalls asking Special Agent Pond about the status of the Karimi recordings in a conversation in Washington, DC on or about February 18 or 19, 2020. Special Agent Pond recalls this conversation, but she understood at the time that AUSA Kim was asking about the 2016 Karimi interviews. AUSA Kim also recalls asking Special Agents Pond and DePresco about the status of the Recording in a conversation during trial. Neither Special Agent Pond nor Special Agent DePresco recalls this conversation.

On February 23, 2020, defense counsel renewed their request for the Recording. *See* Ex. O at 1. AUSA Kim responded—inaccurately, but based on her personal understanding at the time—that the FBI had not yet received the Recording. *Id.*

On February 27, 2020, Special Agent DePresco sent an email to AUSAs Kim, Krouse, and Lake, copying Special Agent Pond, in which he wrote that he “heard back from RCMP and they advised they did NOT record the interviews with Karimi in 2016.” Ex. P at 1. AUSAs Kim, Krouse, and Lake did not respond to the email.

On March 10, 2020, at the charge conference in this case, defense counsel acknowledged that “[t]he defense did have some discussions with Bahram Karimi” and “[w]e did have some contact with his representative.” Trial Tr. 1355.³ The defense objected to the Court’s proposed instruction regarding uncalled witnesses, however, based on the argument that the Government’s decision to indict Karimi precluded Karimi from testifying at the trial on behalf of the defense. *Id.* The Court initially overruled the defense objection to the uncalled-witnesses instruction, *see id.* at 1357, but revisited the ruling upon learning that the defense did not have access to the Recording of the January 2020 interview, *see id.* at 1358. In response, AUSA Kim stated that the prosecution team had produced to the defense FBI reports and notes from Karimi’s interviews in 2016 and 2020, and stated—inaccurately, but based on her personal understanding at the time—that the FBI had requested the Recording from the RCMP but not yet received it. *See* Trial Tr. at 1358-60. The Court ultimately granted the defense objection and did not give the uncalled-witnesses instruction. *Id.* at 1359.

On March 29, 2020, as part of the diligence in response to the defense’s March 24, 2020 letter, AUSA Lake sent an email to Special Agents Pond and DePresco, copying AUSAs Kim and Krouse as well as SAUSA Lynch, inquiring about the status of the Recording. *See* Ex. Q at 3. On March 30, 2020, AUSA Lake called Special Agent Pond and inquired about the Recording. AUSA Lake recalls that Special Agent Pond said that she believed Special Agent DePresco had the Recording. On March 30, 2020, Special Agent DePresco replied-all to AUSA Lake’s March 29 email, offering to provide a copy of the Recording and noting that the LEGAT

³ In response to your question, Special Agent Pond stopped by the courtroom briefly during the charge conference, but stayed only for a few minutes. She determined that her presence was not necessary and went back to her office. During the few minutes that Special Agent Pond was present, she did not hear any discussion about the Recording. Special Agent DePresco was not present in the courtroom at all during the charge conference and, to the prosecution team’s knowledge, no other FBI agents were present in the courtroom during the charge conference.

had received the Recording on February 4, 2020. *Id.* On March 31, 2020, the Government made a copy of the Recording available to the defense.

Respectfully submitted,
GEOFFREY S. BERMAN
United States Attorney

By: _____/s/
Michael Krouse / Jane Kim / Stephanie Lake
Assistant United States Attorneys
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Enclosures

Cc: Hon. Alison J. Nathan (Via ECF)

EXHIBIT A



FEDERAL BUREAU OF INVESTIGATION

Date of entry 07/01/2016

BAHRAM KARIMI (KARIMI), date of birth [REDACTED], Passport ID: [REDACTED] [REDACTED] was interviewed by SA Benjamin Denk and SSA William Wikstrom at the Fairmont Waterfront located at 900 Canada Place Way, Vancouver, BC, Canada V6C3L5. Garrett Lynch, Deputy Bureau Chief, and Christina Maloney, Assistant District Attorney, from the New York County District Attorney's Office (DANY) participated in the interview. Also present in the interview were Constables Ed Fox and Amberia Sovdi from the Royal Canadian Mounted Police (RCMP). After being advised of the identity of the interviewing Agents and the nature of the interview, specifically that the interview was voluntary and KARIMI was free to leave at any time, KARIMI provided the following information:

KARIMI graduated from Tehran University in or about 1990. After completing his mandatory military service in the Iranian government in or about 1993, KARIMI began working for STRATUS INTERNATIONAL CONTRACTING COMPANY (STRATUS) based in Tehran, Iran. KARIMI has more than 25 years of experience in the construction industry, the majority of which were spent working for STRATUS. KARIMI began his tenure at STRATUS as a site engineer working on excavation projects and, during the course of his career, was promoted to the position of project manager and technical director, both of which were considered management level positions.

MOHAMMAD SADR HASHEMINEJAD (MOHAMMAD SADR) founded STRATUS as a private company in or about 1977, prior to the Iranian Revolution. However, the majority of STRATUS's business activity did not begin until in or about 1984. Within STRATUS, there was a procurement department, finance department, administrative department, and project managers and engineering directors all of which reported directly to the general manager. The general manager reported directly to MOHAMMAD SADR. STRATUS also maintained a board of directors which was occupied at one time or another by MOHAMMAD SADR, ABBAS TAHERI (TAHERI), FARSHID KAZERANI (KAZERANI), and BEHROOZ

Investigation on 06/16/2016 at Vancouver, Canada (In Person)

File # [REDACTED] Date drafted 06/20/2016

by Benjamin Denk

[REDACTED]

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ZANGENEH (ZANGENEH), amongst others. TAHERI held the position of general manager until he passed away in or about March 2008 at which time KAZERANI took over the role of general manager at STRATUS.

STRATUS's principle business activity was construction and it was definitively 100% owned and/or controlled by MOHAMMAD SADR. KARIMI knew this to be the case because of his roles and responsibilities while employed by STRATUS. KARIMI was not aware of any Iranian government involvement in STRATUS since its inception.

KARIMI was an engineering and/or technical director at STRATUS from in or about 2001 to in or about 2009. In or about 2009, KARIMI left STRATUS in Iran to become a project manager for STRATUS's branch in Venezuela, the IRANIAN INTERNATIONAL HOUSING COMPANY (IIHC). During his time as an engineering and/or technical director, KARIMI reported directly to TAHERI, STRATUS's general manager. In his role as engineering and/or technical director, among other items KARIMI was responsible for quality control, quality assurance, cost estimates, and preparing invoices and IPCs (writer comment: IPC is an acronym for "Ingenieria, Procura y Construccion" which translates to "Engineering, Procurement and Construction"). KARIMI oversaw the work of approximately 12-15 employees as an engineering and/or technical director.

Most of STRATUS's business was located in Iran, however there were a few projects located in other countries like Pakistan, Yemen, Bangladesh, Iraq and Venezuela. The projects in Iraq did not begin until after KARIMI moved to Venezuela and were ultimately suspended due to the ongoing war in Iraq. KARIMI worked on a project for STRATUS in Pakistan in or about 1994 when he first started at the company before moving back to Iran. KARIMI believed STRATUS was a top 10 construction company in Iran prior to 2009, however KARIMI thinks it may be bankrupt now. According to KARIMI, MOHAMMAD SADR has interests in many industries other than construction that take up a lot of his time and this could be why STRATUS has suffered recently.

In or about 2009, KARIMI moved to Venezuela to assume the role of project manager for an approximately \$600 million construction project STRATUS was awarded to construct approximately 7000 housing units. KARIMI noted the contract for the Venezuelan project was awarded to IIHC, but this

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was in name only and it was really executed by STRATUS. KARIMI took his family with him and lived there for approximately four years. KARIMI left his family in Caracas where his children attended an American school and he spent a majority of his time in Ojeda where the project site was located.

According to KARIMI, in or about 2006 a protocol was established between the Iranian and Venezuelan governments to construct a housing development in Venezuela. The Iranian government invited STRATUS to perform the work but because the housing development was bigger than any project STRATUS had ever done, STRATUS organized a consortium of Iranian companies. That consortium was called IIHC. IIHC was established specifically for the Venezuelan housing project and would cease to exist after the project was completed. After approximately one or two years of negotiations between the Iranian and Venezuelan governments, in or about 2009 IIHC signed a contract to build the housing development. KARIMI was aware that the Iranian government invited Iranian companies to bid on projects in Venezuela but was not involved in how IIHC ultimately was awarded the contract. Initially, STRATUS owned 16% of IIHC. Once IIHC was awarded the contract to build the Venezuelan housing development, STRATUS took full control of IIHC. KARIMI knew this because he saw the business documents.

Separately, KARIMI noted that all along he intended to emigrate to Canada with his family. TAHERI assigned KARIMI to the project manager position in Venezuela to help KARIMI get to Canada. KARIMI applied for Canadian status for he and his family in or about 2009, around the time they moved to Venezuela. ZANGENEH took over as general manager after TAHERI passed away in or about March 2008 (writer comment: It was unclear whether ZANGENEH took over as general manager of STRATUS or IIHC). ZANGENEH's role as general manager kept him in Tehran, Iran. While in Venezuela, KARIMI reported directly to ZANGENEH and ZANGENEH reported directly MOHAMMAD SADR.

Pursuant to its project to construct a housing development in Venezuela, STRATUS formed a committee known as the Venezuela Committee. Members of the Venezuela Committee included, among others, KARIMI, MOHAMMAD SADR, ZANGENEH, KAZERANI, HOSSEIN TEHRANI (TEHRANI), and ALI SADR HASHEMINEJAD (ALI SADR). TEHRANI was only a part of the Venezuela Committee for approximately six months to one year while KARIMI temporarily relocated to Turkey. While the Venezuela Committee existed to oversee the project, the important decisions were really made by MOHAMMAD SADR. KARIMI, ZANGENEH and TAHERI, until TAHERI passed away, were the principle people involved in the

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Venezuelan housing project. KARIMI considered ALI SADR, someone he has known since ALI SADR was a boy, to be a "big businessman." ALI SADR sometimes visited the project site in Venezuela and ultimately became involved in the project.

There were many issues with the Venezuelan housing project and those issues went directly to MOHAMMAD SADR to be resolved. IIHC enlisted the assistance of the Iranian government to help resolve issues IIHC had with the Venezuelan government but the Iranian government's assistance was largely ineffective. KARIMI believed Iran President MAHMOUD AHMADINEJAD (President AHMADINEJAD) visited Venezuela twice while KARIMI was project manager but KARIMI did not see him personally. Iran's Minister of Industry visited Venezuela while KARIMI was project manager but only the Deputy Minister of Industry visited the project site. Iran's Ambassador to Venezuela got involved with the project to help resolve issues but only had a negative effect.

KARIMI met with Iran's Ambassador to Venezuela ABDOLREZA MESRI (Ambassador MESRI) and later HOJJATOLLAH SOLTANI (Ambassador SOLTANI) on several occasions to try and put pressure on the Venezuelan government to resolve some of the issues IIHC was facing. Again, it had little if not a negative effect.

KARIMI met with JOSE LUIS PARADA (PARADA) from DESARROLLOS URBANOS COSTA ORIENTAL LAGO SA (DUCOLSA) approximately three times seeking payment. DUCOLSA was the Venezuelan entity in charge of the housing project that had the contract with IIHC. KARIMI met with RAFAEL RAMIREZ (RAMIREZ) approximately one time.

At the project's peak operating time, KARIMI estimated there were 160 Iranian personnel, 35 sub-contractors and 200 local hires at the project site. The Iranian personnel consisted of engineers and skilled workers and the local hires consisted of laborers and some engineers.

STRATUS established a branch office in Turkey to support the Venezuelan housing project and to receive US dollar payments. The branch office was

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initially known as STRATUS INTERNATIONAL CONTRACTING (Turkey) and later changed its name to STRATURK INSAAT VE TAAHHUT (Turkey) (both herein referred to as "STRATUS TURKEY"). MUSTAFA CETINEL was in charge of STRATUS TURKEY and KARIMI reported to him. CETINEL was an expert in tunneling and was brought in to apply his expertise to the Venezuelan housing project. KARIMI noted that STRATUS TURKEY was established specifically to support the Venezuelan project and facilitate financial transactions because of international sanctions. KARIMI noted STRATUS TURKEY did not exist before the project began and was sold off after the project was suspended.

EKREM CINAR was a deputy project manager in Venezuela in charge of overseeing the Turkish workforce and tunnel construction. CINAR reported to KARIMI. KARIMI noted CINAR was also a member of STRATUS TURKEY.

AHMAD SAFAVARDI lived in California and had a number of years of experience working for the Iranian government. SAFAVARDI was involved with the Venezuela housing project for approximately six months and was brought in to enlist the assistance of the Iranian government, including the Iranian Embassy in Caracas, to resolve issues. SAFAVARDI was unsuccessful in his attempts at resolving those issues. KARIMI noted MOHAMMAD SADR made the decision to bring guys like SAFAVARDI in to the Venezuelan housing project.

MOHAMMAD SADR was unable to visit the project in Venezuela so ALI SADR visited in MOHAMMAD SADR's absence and reported back to him. ALI SADR was involved in managing project finances and payments. ALI SADR was based in many locations and "lived in the air."

KARIMI noted that everyone associated with STRATUS and the project in Venezuela recognized the international sanctions placed on Iran but believed that circumventing those sanctions was a matter of survival. STRATUS needed to be able to conduct business in US dollars. STRATUS setup entities in Turkey and Switzerland in order to receive payments in US dollars. KARIMI believed the sanctions really only affected the Iranian people and not the Iranian government which made life difficult. This was part of the reason MOHAMMAD SADR hated the Iranian government.

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STRATUS maintained bank accounts at Hyposwiss Private Bank and Falcon Private Bank in Switzerland. CLARITY TRADE AND FINANCE (CLARITY) was an entity setup in Switzerland to receive payments from the Venezuela housing project. ALI SADR was responsible for managing this part of the business and provided this information to KARIMI via email. KARIMI also observed CLARITY and its account information on invoices in relation to the Venezuela housing project. KARIMI believed the company name and corresponding bank account information to which payments were to be made in relation to the Venezuelan housing project changed approximately three times over the duration of the project. The payment instructions included in the IIHC letters sent to DUCOLSA, including the name of the beneficiary, the beneficiary's bank, the beneficiary's bank account information and the intermediary bank, all came from ALI SADR and occasionally ZANGENEH.

KARIMI believed the name IRANIAN INTERNATIONAL HOUSING COMPANY was a mistake because it attracted scrutiny so he often referred to it as "IIHCO." KARIMI claimed it was a "group decision" to change the name IRANIAN INTERNATIONAL HOUSING COMPANY.

Due in part to the Venezuelan governments lack of US dollars, in or about 2013 IIHC's contract for the Venezuelan housing project was changed from 100% US dollars to 55% US dollars and 45% Venezuelan bolivars. KARIMI noted this was a disaster due to Venezuela's high inflation. IIHC enlisted the assistance of the Iranian Embassy to resolve this issue but it was unable to do so.

KARIMI acknowledged there was a modification to IIHC's original contract and the value increased from approximately \$475 million to approximately \$575 million and the number of housing units increased an additional 5000 housing units.

KARIMI did not know ALEXANDER FREI.

KARIMI did not know the ultimate destination of the payments the IIHC received for performance of the contract. KARIMI noted JP Morgan Chase Bank was an intermediary bank between DUCOLSA and CLARITY. ALI SADR controlled

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CLARITY. KARIMI thought CETINEL told him this. KARIMI was unsure of the relationship ALI SADR had with his father, MOHAMMAD SADR.

KARIMI noted there were other Iran - Venezuela projects going on in Venezuela like other housing projects and automobile projects but STRATUS didn't do anything other than this particular housing project.

KARIMI stopped working for IIHC in or about October 2014 and relocated to Canada with his family. KARIMI received his Canadian status in or about August 2014 and this was the driving factor behind him leaving IIHC and Venezuela. KARIMI advised CETINEL and ZANGENEH of his decision to leave. ZANGENEH was upset at KARIMI's decision for professional reasons. KARIMI was replaced by AMIR HEIDAR ALIZADEH (ALIZADEH), his deputy project manager at the time. KARIMI remained in contact with some friends at STRATUS but is trying to distance himself from STRATUS because of its changing management.

KARIMI reviewed an email dated 03/16/2011 sent from KARIMI at [REDACTED] to ALI SADR at ali.sadr.h@gmail.com. Attached to the email was a document on IIHC letterhead dated 2/12/2011. KARIMI acknowledged the email was his and the signature on the attached document was his. KARIMI he noted he signed for ZANGENEH and was authorized to do so.

KARIMI reviewed an email dated 11/09/2010 sent from BANAFSHE YADEGARZADE at banafsheyadegarzade@yahoo.com to ALI SADR at ali.sadr.h@gmail.com, cc'ing KARIMI at [REDACTED]. Attached to the email was a document on IIHC letterhead dated 10/28/2010. KARIMI confirmed ZANGENEH's signature on the letter and IIHC's address in Tehran, Iran. KARIMI noted this was a separate location from STRATUS's main office in Tehran, Iran.

KARIMI reviewed an email dated 07/26/2011 sent from GABRIELA SANCHEZ (SANCHEZ) at sgabriela07@gmail.com to lilianarcox@gmail.com, ARMANDO SANCHEZ at sanchezaxy@pdvs.com and asnacional@hotmail.com. Attached to the email was a document on IIHC letterhead dated 07/22/2011. KARIMI confirmed his signature on the letter. KARIMI signed for ZANGENEH and was authorized

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to do so. KARIMI was not given an explanation as to why the beneficiary changed from STRATUS to CLARITY. KARIMI reiterated this information mostly came from ALI SADR and he didn't know why the beneficiary changed.

KARIMI reviewed an email dated 09/27/2011 sent from TOORAJ TORABI at t.torabi@hotmail.com to SANCHEZ at sgabriela07@gmail.com and sanchezgao@pdvsa.com. Attached to the email was a document on IIHC letterhead dated 09/27/2011. KARIMI confirmed his signature on the letter.

KARIMI reviewed an email dated 10/24/2011 sent from SANCHEZ at sgabriela07@gmail.com to galindezgc@pdvsa.com. Attached to the email was a document on IIHC letterhead dated 10/24/2011. KARIMI identified the signature on the document as belonging to CINAR. KARIMI authorized CINAR to sign for him.

KARIMI reviewed an email dated 08/26/2013 sent from CETINEL at m.cetinel@superonline.com to ALI SADR at ali.sadr.h@gmail.com, cc'ing LINET ESTIROTI at linet.estiroti@stratusinternational.com.tr. Attached to the email was a document on IIHC letterhead dated 08/23/2013. KARIMI confirmed CETINEL signed for KARIMI and that KARIMI authorized him to do so as KARIMI was not in Venezuela at the time. KARIMI stated the IIHC's bolivar account identified in the document was the account used for the day to day operations of the project. KARIMI noted the payment structuring changed due to the Venezuelan government's lack of US dollars and this change was directed by Venezuela President HUGO CHAVEZ (President CHAVEZ). The Venezuelan government pushed for this change beginning in or about 2011 but it was not executed until in or about 2013.

KARIMI reviewed an email dated 08/06/2014 sent from LUIS MORILLO (MORILLO) at morillo.l@iikhco.com.ve to KARIMI at [REDACTED], KARIMI at [REDACTED], cc'ing SAFAVARDI at asafavardi@gmail.com, CETINEL at m.cetinel@superonline.com and ALIZADEH at heidar.a@iikhco.com.ve. Attached to the email were documents both on IIHC letterhead and both dated 08/06/2014. KARIMI stated MORILLO was his secretary at IIHC and noted that MORILLO had lived in the US for approximately 10 years. KARIMI confirmed ALIZADEH was his deputy at IIHC. KARIMI confirmed his signature on both letters. KARIMI did not recall SPANRISE HOLDING GMBH (SPANRISE) or the nature of its existence but thought it was setup by ALI SADR.

Continuation of FD-302 of (U) Interview of Bahram Karimi on 06/16/06, On 06/16/2016, Page 9 of 10

KARIMI reviewed an email dated 08/06/2014 sent from ESTIROTI at linet.estiroti@straturk.com.tr to CETINEL at m.cetinel@superonline.com, cc'ing KARIMI at [REDACTED]. Attached to the email was a document on SPANRISE letterhead containing US dollar account details for SPANRISE. KARIMI identified ESTIROTI as the secretary for CETINEL and ALI SADR. ESTIROTI was based in Turkey. KARIMI indicated STRATURK became the new name for STRATUS INTERNATIONAL CONTRACTING (Turkey) but KARIMI was unsure when the name change took effect. KARIMI reiterated he did not recall anything about SPANRISE.

KARIMI reviewed an email dated 06/26/2014 sent from MORILLO at morillo.l@iihco.com.ve to KARIMI at [REDACTED], KARIMI at [REDACTED], cc'ing CETINEL at m.cetinel@superonline.com and ALIZADEH at heidar.a@iihco.com.ve. Attached to the email was a document on IIHC letterhead dated 06/26/2014. KARIMI confirmed his signature on the document and stated he had to change the style of his signature because an unknown person forged his previous signature and stole \$100,000 from an IIHC bank account.

KARIMI confirmed the payment instructions included in the IIHC's letters to DUCOLSA mostly came from ALI SADR.

KARIMI reviewed an email dated 05/17/2009 sent from HASTI GHAPCHI (GHAPCHI) at h.ghapchi@gmail.com to ALI SADR at ali.sadr@spanrise.com, ALI SADR at ali.sadr@spangrp.com, cc'ing moayed@stratusgc.com. Attached to the email was a document titled "Venezuela housing project MOM.pdf." KARIMI confirmed the email was to ALI SADR. KARIMI did not know GHAPCHI. KARIMI confirmed the signatures on the attached document. The attached document was an old document dating from the time the Venezuela Committee was initially formed. KARIMI confirmed the size and scope of the project and stated it was necessary for STRATUS to form the Venezuela Committee to oversee the project. KARIMI confirmed the Venezuela Committee held regular meetings around the time the project was just beginning which was also around the time KARIMI was still in Iran. KARIMI confirmed part of the document was a report prepared by him for the Venezuela Committee. KARIMI stated he was not directly involved with any Ministers from the Iranian government. KARIMI did not relocate permanently to Venezuela until in or

[REDACTED]

Continuation of FD-302 of (U) Interview of Bahram Karimi on 06/16/06, On 06/16/2016, Page 10 of 10

about 08/02/2009 and that was after President AHMADINEJAD visited Venezuela in or about April 2009. KARIMI did not recall if IIHC personnel worked out of STRATUS's main office in Tehran, Iran. KARIMI confirmed MOHAMMAD SADR was the president of both STRATUS and IIHC. KARIMI confirmed his position as project manager for IIHC and recalled the meetings documented in the attached document. (writer comment: The email and attached document were originally in Farsi and translated to English. Both the English and Farsi versions were provided to KARIMI for his review.)

KARIMI reviewed an email dated 03/07/2011 sent from ALI SADR at ali.sadr.h@gmail.com to ZANGENEH at zangeneh@stratusgc.com. Attached to the email was a document on IIHC letterhead titled "Minutes From Extraordinary General Meeting In 'Iranian International Housing Company.'" KARIMI did not recall the extraordinary general meeting but believed it was a board meeting and not a Venezuela Committee meeting. MOHAMMAD SADR was the chairman of the board and the Venezuela Committee. KARIMI did not recall who proposed changing the name of IIHC but thought maybe ZANGENEH asked that it be changed.

KARIMI reviewed an email dated 10/24/2011 sent from ALI SADR at ali.sadr.h@gmail.com to CETINEL at m.cetinel@superonline.com. KARIMI did not think IIHC's name was ever officially changed. KARIMI recalled conversations about changing IIHC's name but claimed those conversations took place mostly above KARIMI between CETINEL and ALI SADR. KARIMI stated that CETINEL would normally cc KARIMI on all emails. KARIMI reiterated he was not involved in those types of conversations.

KARIMI reviewed an email dated 03/06/2014 sent from CETINEL at m.cetinel@superonline.com to MOHAMMAD SADR at sadr@samanehstratus.com, cc'ing ALI SADR at ali.sadr.h@gmail.com, ZANGENEH at zangeneh@stratusgc.com, SAFAVARDI at asafavardi@gmail.com, CINAR at ekrem.cinar@istanbul.com, KARIMI at [REDACTED] and KAZERANI at farshid.kazerani@gmail.com. Attached to the email was a document titled "MINUTES OF MEETING." KARIMI confirmed the document was an accurate description of the Venezuela Committee members as he knew it when he left IIHC and Venezuela, except that SAFAVARDI left before KARIMI did.

EXHIBIT B

- Construction 25 + years
- Tehran University
- 2009 proj mgmt in UZ w/ intent to move to Canada.
- kids in American school
- 2 yrs (Caracas ^{family} only) 2 yrs Ojedan
- 1 yr Turkey
- \$600 million project in UZ 7000 unit.
- degree in 1990
- Bulk of time @ "Head Office"
 - ↳ Private to "Straus International Contracting Co" All experience w/ Straus.
- ^① Started as site engineer in excavation
- ^② Became Site Manager then project Manager/Technical Director. Both Management level positions.
- Org. Structure.
- Abbas Taheri did March 2008 (G.M.)
- New G.M. Farshid Kazerani
- Mohammad Sadr Heshminejad Founder of Straus before revolution in 1977.
- Most activity started in 1984.

- Principle business in construction.
- Definitely owned 100% by MSH.
- Because of his responsibilities he knew that to be true.
- CEO = MSH Abbas Taheri, F. Razani ~~2000~~ 2008.
(as G.M.). Zangeneh (until 2008) left Shabas in 2009.
- No involvement by Iranian govt since beginning that BK knows of.
- BK Eng. & Tech. Dir 2001 - 2009 went to UZ as Proj. Mgr.
- Only reported to General Manager (Taheri)
- Role as Tech. Director
 - QC, QA, Cost Estimation, Preparing IPC, Preparing invoices
 - 12 - 15 people in Dept.
- Projects in Pakistan (1994) 1 yr then moved to Tehran.
- Shabas projects principally in Iran. but also Bangladesh, Yemen, Iraq (after BK left) all of which are suspended because of war. UZ contract under other name ^{by BK} ~~was~~ executed by Shabas.
- Prior to 2009 ^{for construction} was much bigger company. Shabas may be bankrupt now.

- MSH has many other industries he works in, dedicating his time.
- 18 month military service only went exp 91-93
- VZ Project.
 - Protocol b/w VZ + Iran to construct housing project in (2006?). Consortium was formed after 1-2 yrs negotiation b/w VZ + Iran. Signed contract in 2009.
 - Govt invited private cos to bid on projects in VZ. Not involved in how Strahs got proj' or negotiation. Kaysen involved in diff proj' in VZ.
 - Consortium = Strahs, IIHC (setup only ~~for~~ for this project + will not exist after this project). During negotiation
 - Strahs + other companies formed IIHC ^{originally} a couple years. Strahs owned 16%. Eventually Strahs took full control of IIHC. (SK saw documents)
 - Applied to Canada in 2009. Teheri assigned Karimi as PM in VZ to help him get to Canada.
 - 2009 Zangeneh to ~~IIHC~~ ^(G.M.). He sits in Tehran + SK reported directly to him. Zangeneh reported to MSH.

- VZ Committee existed but decisions were really made by MSH.
- VZ Committee made up of MSH, Z, Kerean, BK, Taheri (for 6mo-1yr while BK in Turkey)
- MSH big businessman. Sometimes would go to project. Ultimately became involved in project.
- Zang, BK, Taheri principle people involved in VZ project
- Many issues w/ project. Those issues went to MSH.
- Iranian govt did not help solve problems. MHC had w/ VZ govt.
- When BK was PM, Ahmadizadeh visited NC twice. BK didn't see him.
- Minister of Industry visited VZ, only his Deputy visited project.
- Amb was involved in project to solve problems but his effect was negative.
- BK had conversations w/ Amb. Soltani / Mesri (M) to sometimes to put pressure on VZ govt to solve issues.
- Met w/ Parack 3 times to get paid.
- Met w/ Ramirez 1 time
- At peak 160 Iranian, 35 subcontracts, 200 locals, 2000 labor some engineers

- Mustafa Cehnel - Needed Turkish expertise in tunneling for project
 - ↳ BK reported to Cehnel
- Branch of Shahis Head in Turkey
 - ↳ Branch established in Turkey solely for project to conduct financial trans ^{because of sanctions} & support oversight.
 - 1. Shahis, 2. Stark 3. 5-10 when project was suspended.
- Ekrem Cinar
 - ↳ Deputy PM in UZ to oversee Turkish people
 - ↳ tunnel building. Also member of Shahis Branch in Turkey.
- Ahmad Safavard
 - ↳ living in CA
 - involved for 6 months to solve problem w/ Embassy. Not successful. MSHT decided to bring guys in like AS.
- ASHT
 - MSHT could not visit project in UZ so ASHT went in his place & reported directly to MSHT.
 - ASHT involved in raising money & payments.
 - He is based in many places. "Lived in the air"
 - recognizes sanctions but had to survive because sanctions only affected people not govt.

- Needed to be able to do business in USD.
- Stratus Bank Accts) in Switzerland @ Repowissi Falcon private banks.
 - Clarify Trade - entity info attached to subpoenas. how BK knows about Clarify
 - ASH responsible for this part of business
- ASH provided this info to BK (via email)
- thinks company payment was to be made was changed 3 times.
- The name Iranian Int'l Housing Co was a mistake. BK referred to it as IHCo.
- Group decision to change name.
- Until 2013 contract was 100% USD. In 2013 A to 55% BSF, 45% USD. This was a disaster because of inflation. Early was not able to fix this.
- Modification from \$475M to ~~\$575M~~
+ ⁵⁰⁰⁰ more houses.
- Doesn't know Swiss Alexander Frye.
- Didn't know ultimate destination of payment.
- JP Morgan was an intermediary bank b/w Swiss & DUCOLSA.

- Clarity was controlled by ASH. (defined / told)
BK (thinks) ASH was in control of Clarity.
- Unsure of relationship b/w ASH & MSK.
- Strahs didn't do anything else in VZ.
- There were other Iran - VZ projects in VZ.
- BK ended working for IHCo in 10/2014.
and came to Canada. Received skills in 8/2014.
Driving factor behind BK leaving IHCo & VZ.
Told defined - Zangeneh. Z was upset w/
BK for professional reasons. Replaced by
Amir Alizadeh. (former Deputy). Remained in
contact w/ some friends but trying to
stay away from Strahs (changing agent).
-

Documents

12^(b) Email is mine. ASH is other.

BK signed for Zangeneh.

9^(b) Confirms Zangeneh's signature.

Address for main office in Tehran

(separate from Strahs location)

* 18^(b) BK confirms his signature. Not given explanation
as to why changed from Strahs to Clarity.

(came mostly from ASH. Doesn't know why the change.)

20^(b) Confirms signature is BK

22^(b) Confirms the signature is EK or Bier.
BK authorized EC to sign for him.

32^(b) Confirms Cebine / signature. BK not in VZ @ home. Bs Account in VZ was account used for day to day operations. Payment structures changed due to lack of USD. e direction of Chavez. Pushed for this in 2011 but not enacted until 2013.

37^(b) Luis Morillo was BK's secretary.
He was 10 yrs in US.

Confirmed AHA was BK's deputy.

Confirmed BK's signature.

Doesn't recall Spanrise - or its nature.
Thinks setup by ASH.

38^(b)

Esfrobi is the Secretary of
Lehnel & ASH based in Turkey
Stratwerk became new name of
Shahz entity in Turkey
(unsure when).

Doesn't recall anything about
Spanrise.

45^(b)

Confirms signature (changed sig
because someone forged his sig
on \$100,000).

1^(a)

Email to ASH. Doesn't know
Qaphchi. Confirms signatures.
OC doc from when committee
was formed. Confirms size &
scope of project. & necessity
for formation of committee.
Meetings regularly held when BK
still in Iran & beginning.

BK's report to Committee. Not directly
involved w/ Ministers from Iran Govt.

BK not in UZ @ time of Ahmedieejods visit in April 2009. BK didn't go permanently until 8/2/2009.

Roles & Responsibilities. Assignments.

Kazerani: 11-3 Doesn't recall if IHAC people working out of head strahs office in Tehran

Confirms NSH President of Both

BK assigned as PM. BK recalls meetings.

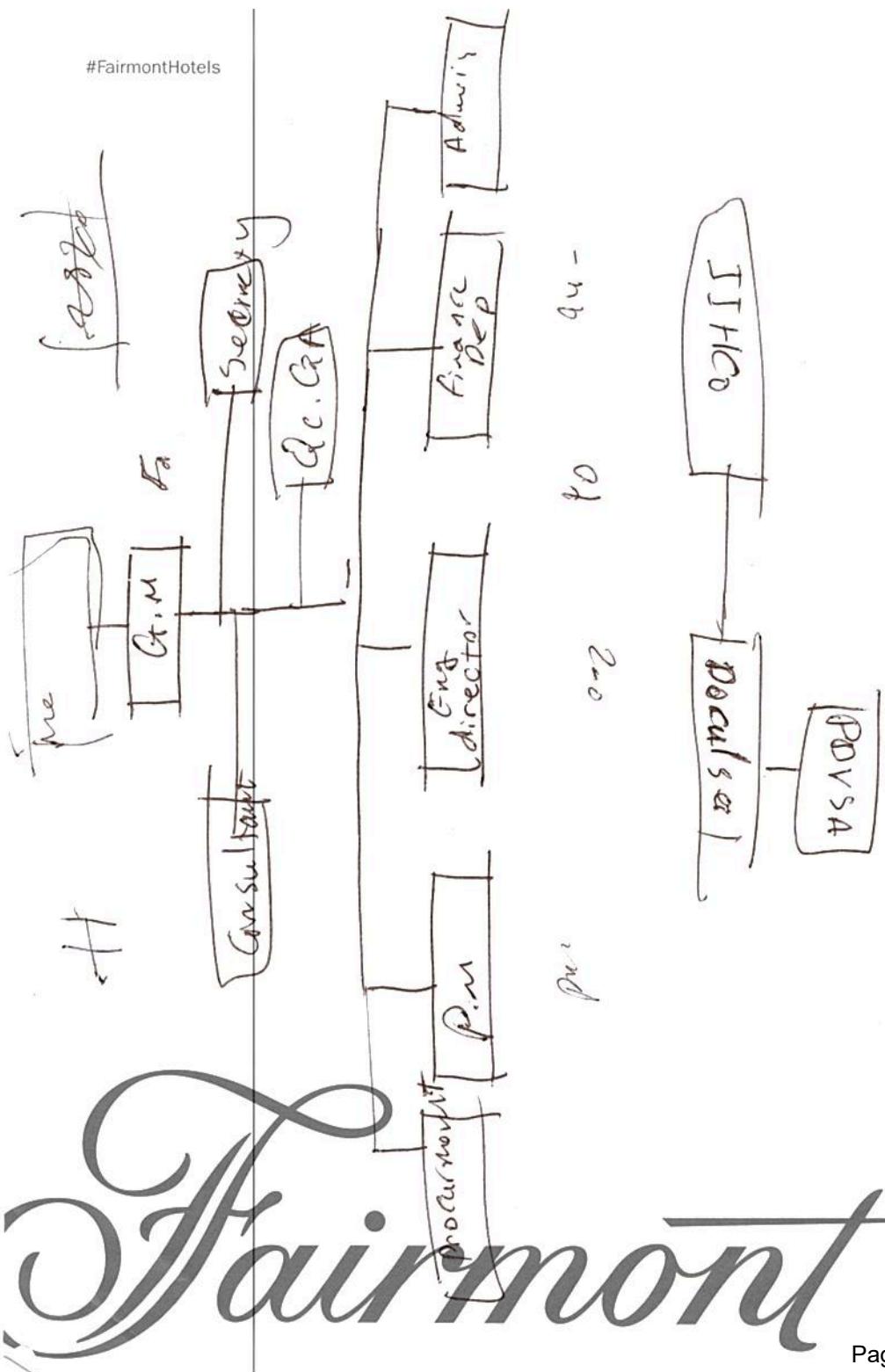
#(1)(A) Does not recall extraordinary general meeting. It was Board Meeting not Committee meeting. NSH is Chairman of Board & Committee. Does not recall... maybe Zangeneh asked that name be changed.

21^(a) Doesn't think name officially changed. recalls conversations but mostly about BK (Chael & ASIT) Normally Behnel would CC BK on everything. BK not involved in these types of conversations.

35^(a) Committee as BK knew it when he left (except AS left before BK)

[REDACTED]

New address



47
T 160 200
Car 351
1
V
1
1

57

90001

001005

001 911.

46
6.3
57
W.D. 2009
15.20
1111100
W.D.

EXHIBIT C



FEDERAL BUREAU OF INVESTIGATION

Date of entry 10/05/2016

BAHRAM KARIMI (KARIMI), date of birth [REDACTED] Passport ID: [REDACTED]
 [REDACTED] was interviewed by SA Benjamin Denk at the Fairmont Waterfront located at 900 Canada Place Way, Vancouver, BC, Canada V6C3L5. Christina Maloney, Assistant District Attorney, New York County District Attorney's Office (DANY) participated in the interview. Also present in the interview was Cpl Sean Kinney from the Royal Canadian Mounted Police (RCMP). After being advised of the identity of the interviewing Agent and the nature of the interview, KARIMI voluntarily provided the following information:

KARIMI reviewed a document dated 10/15/2012. The document was on IRANIAN INTERNATIONAL HOUSING COMPANY (IIHC) letterhead and addressed to JOSE LUIS PARADA SANCHEZ (PARADA) from KARIMI. KARIMI stated he did not sign the document and was not in Venezuela during the referenced time period. KARIMI thought maybe the signature was that of HAMID SHAYGAN.

KARIMI reviewed a document dated 07/01/2011. The document was on IIHC letterhead and addressed to PARADA from BEHROOZ ZANGENEH (ZANGENEH). KARIMI initially confirmed the signature belonged to ZANGENEH. KARIMI then reviewed an email dated 07/02/2011 from MUSTAFA CETINEL (CETINEL) at m.cetinel@superonline.com to ZANGENEH at zangeneh@stratusgc.com, cc'ing ALI SADR HASHEMINEJAD (ALI SADR) at ali.sadr.h@gmail.com. After reviewing the email, KARIMI stated the signature on the document was "similar" to ZANGENEH's signature.

KARIMI reviewed a document dated 08/27/2013. The document was on IIHC letterhead and addressed to DESARROLOS URBANOS COSTA ORIENTAL LAGO SA (DUCOLSA) from KARIMI. KARIMI confirmed CETINEL signed the document on KARIMI's behalf.

KARIMI reviewed a document dated 12/11/2014. The document was on IIHC

Investigation on 09/14/2016 at Vancouver, Canada (In Person)

File # [REDACTED] Date drafted 09/16/2016

by Benjamin Denk

[REDACTED]

Continuation of FD-302 of (U) Interview of BAHRAM KARIMI on 09/14/16, On 09/14/2016, Page 2 of 2

letterhead and addressed to DUCOLSA from KARIMI. KARIMI believed he had already relocated to Vancouver, BC by that time. KARIMI relocated to Vancouver, BC in or about October 2014. KARIMI openly questioned whether someone from IIHC signed the document using KARIMI's signature even though he was no longer involved in the project. KARIMI questioned whether other documents from 2014 and beyond also had his signature on them.

KARIMI recalled that US dollar payments related to the project stopped at one point in or about November 2013 but that it was possible US dollar payments resumed in or about 2014.

KARIMI reviewed a document dated 06/26/2014. The document was on IIHC letterhead and addressed to DUCOLSA from KARIMI. KARIMI confirmed his signature and stated only the Bolivar portion of the payment referenced in the document was executed. The US dollar payment was not executed because Venezuela was suffering from a lack of US dollars.

After SA Denk and ADA Maloney completed the document review with KARIMI, SA Denk asked KARIMI to go into further detail about KARIMI's time in Turkey. KARIMI stated he left Venezuela to go back to Turkey because the visa processing time was quicker at the time and the main reason KARIMI and his family relocated to Venezuela in the first place was to obtain visas. KARIMI stated CETINEL was employed by STRATUS INTERNATIONAL CONTRACTING in Turkey and was a member of its board. KARIMI initially indicated CETINEL was his boss on the Venezuelan housing project but became uncomfortable when further questioned about CETINEL's roles and responsibilities. KARIMI later stated he considered CETINEL to be a close friend and he had known him for a long time. KARIMI did not want to cause trouble for CETINEL.

EXHIBIT D

9/14/16

1. Document 10/15/12

Karimi not in VZ at the time (Turkey)

Maybe Hamid Shagyan?

2. Document 7/1/11

Confirms Zangeneh signature

"similar"

3. Document 8/27/2013

Confirms Cebic / signature

4. Document 12/11/14

Karimi thinks he was not there. Relocated
to Ven BC in Oct 2014.

Karimi remembers USD payments stopped
in 11/2013. Believed no RMB payments were
made in 2014.

5. Document: 06/20/2014
confirmed his signature. Stated USD
was not paid. Only Bs was paid.
Reason was a lack of USD.

Cahinci employed by StoraEnso Turkey
Board Member. Karim's boss on project
Karim measure what his other responsibilities
were in Turkey.

EXHIBIT E

Bahram Karimi - 1/22/2020

Present : Michael Krouse, Jane Kim, SA Leigh Ann Pond, SA Robert Depresco
 Constable Christine Larsen (RCMP), Joseph Saulnier (defense counsel), Farsi interpreter
 (Arash Androodi)

- Born in Iran
- Graduated U. of Tehran in civil engineering in 1990
- Worked in various construction jobs before graduating and after
- Joined Stratus in 1994 (or 1993) - started as a site engineer, later became a site manager
 - Manager of tenders and project control - managed complex projects
 - Manager of the technical side of the company (Technical and Engineering Department)
- Stratus Contracting
 - Founded by Mohammed Sadr in 1977 or 1978 - had a different name (Manifest)
 - Was a family company - Mohammed Sadr was the primary decision-maker
 - Large & successful construction company (100% private and based in Iran)
 - After 1995, Sadr expanded into other companies
 - Founded the first Iranian private bank (EN Bank)
 - Created Stratus Holding to manage all of his companies → M. Sadr was in charge
 - Abbas Taheri was the managing director of Stratus Contracting - died in 2011
 - ↳ Also Iranian and resided in Iran
 - ↳ Reported to Mohammed Sadr - Karimi reported to Taheri.
 - Stratus Contracting had a Board of Directors - Bahrooz Zanganeh was on the Board before he went to the Venezuela project for 2 years
 - Zanganeh was the head of marketing - also reported to M. Sadr
 - Most of the Stratus construction projects were in Iran
- In 2009, began working on the Venezuela project
 - Sadr & Taheri decided to pursue large-scale construction projects
 - Needed to implement project management procedures - Karimi was chosen to lead this

- Karimi applied to immigrate to Canada in 2008
- Became the project manager in May 2009
 - Visited the project site in Venezuela beforehand
 - Saw that there were English-language schools his children could attend
- Karimi and his family moved to Venezuela in May 2009
 - Contract had been awarded to this other company: (also Iranian)
 - Iranian International Contracting Company (Housing) (also owned by Mr. Sadr) ("IICC")
 - Stratos had agreed w/ that company to implement the project
- ↳ In 2009, Zanganah was the head of this company - based in Iran
- Karimi was in charge on the ground in Venezuela with building the project
 - Started with 40 Iranian staff
 - 160-170 Iranians at the peak of the project
 - 80-90 Turkish staff at the peak
 - 2500-3000 Venezuelan staff at the peak
 - Also 50-60 Venezuelan sub-contractors
 - 2 Turkish sub-contractors (companies)
 - Alper (he thinks)
 - Doesn't remember the other names
- Venezuelan named "Luis" was involved in administration
- Sajid Yazdi - Iranian also involved in administration
- The Gov't of Venezuela was the client - DUCOLSA (under the petroleum company)
 - They controlled the project, made the payments, conducted quality control and had around 120 people on the staff
 - PDVSA & DUCOLSA - Manager was Jose Luis Sanchez Parada (Chairman of DUCOLSA)
 - Karimi had 3-4 meetings w/ Parada
- To his knowledge, Iranian Gov't did not have an interest in the Venezuelan project
 - Is aware of a Memorandum of Understanding b/t Iran + Venezuela to cooperate in various fields
 - Does not know how the IICC was awarded the contract - happened before Karimi was involved in the project

- Always had issues with getting payments
 - Second half of 2013 to 2014, dollar payments were not honored
 - Company tried to collect the payments
 - Even suspended the project for a period
 - Went to the Iranian Embassy
 - A manager at the company contacted the Embassy (Khosro Mobarak)
 - Karimi didn't contact the Embassy
 - Later, another person was the contact w/ the Embassy (Ahmad Safavard)
- Meeting over a \$20 million payment
 - Ambassador participated in the meeting and spoke
 - Safavard, Parada, Karimi, 2 OVCOLSA reps, the Ambassador from Iran to Venezuela
 - Discussed the project during the meeting (thinks his name was Soltani)
 - Main issue was receiving the overdue payments - after the meeting, the Ambassador asked to speak to Parada alone
 - Took place around May, June or July of 2014
- Karimi heard after the meeting (from Safavard, he thinks) - in person that the Ambassador proposed to move the project to Keyson (another Iranian company)
- Safavard was the company's contact w/ the Embassy - reported to Zangeneh & to the Board of IITC
 - Need contact w/ the Embassy when working in a foreign country
 - Also reported to M. Sadr
 - ~~██████████~~ Another of his responsibilities was to develop new business in the region
- Iran wanted the project to be successful - was part of the MOU
- Neither govt was satisfied - payment dispute, suspended the project
 - Safavard and others who dealt w/ the Embassy were told that ~~they were~~ the Iranian govt was not satisfied with the project
 - Chairman of OVCOLSA and his deputies also participated in meetings, as did Parada, the chairman of OVCOLSA ^{↳ or six visits}
- Board for the IITC - did not deal w/ them directly
- Venezuela Committee was formed b/c this project was a much bigger project
 - ↳ new systems were supposed to be implemented
 - Board members of IITC, Board members of Stratus and the team managing the project

JIHC, Stratus

based in Tehran

(Members included) Zahraeh, Tehari, Reza Moayed (from Stratus - claims & contracts manager)

Board member of Stratus (Ghariat), Kazerani (Exe. Dep. Manager of Stratus)

Karimi was also a member

✓ thinks he was added to the committee

Also based in Tehran

Safavandi worked for 7 months toward the end of the project

Mohammed Sadr and Ali Sadr also were on the Venezuela Committee

↳ M. Sadr actually made the decisions

Karimi has known Ali Sadr since he was a child

- A. Sadr did high school and one year of college in Iran
- Moved to the U.S. When he was 19 or 20
- A. Sadr was 31 or 32 when he joined the Venezuela Committee

Cetinel

- Karimi has known him since 2000
- Attended many tenders with him for projects in Turkey (Middle East)
- Did projects jointly with him
- Stratus previously launched an office in Kazakhstan
- Cetinel also worked with Seyer - they managed the company formed by Stratus in Kazakhstan
 - ↳ They reported to Tehari.
 - ↳ Karimi did not work with them until the Venezuela project

Stratus & JIHC were separate entities - but M. Sadr controlled both

↳ signed contract w/ DUCOLSA in 2007

- ↳ JIHC contracted w/ Stratus in late 2008 or early 2009 to execute the Venezuela project
- So Tehari was in charge of the project (since he was the head of Stratus)
- But JIHC was the contracted party - so all comms were under JIHC with the client - constant coordination b/t Stratus and JIHC

✓ Venezuela Committee met regularly in the first 3-4 months, but then met 1-2 times a year while the work was running smoothly - started meeting more when there were payment issues

- The Committee met by video conference

- Did meet in Iran for a committee meeting - traveled there

- Contract b/t IITC and DUCOLSA were specified in U.S. dollars
 - Invoiced them & payments were made through banks
 - Int'l agreement, so based on dollars
 - Rial & Bolivar are not stable currencies
- Karimi was paid in Rials before he moved to the Venezuela project was equivalent to about \$10,000
 - Paid in U.S. dollars during the Venezuela project (paid in deposits to a bank account)
 - Centsel & Ceynar were also paid in dollars

- DUCOLSA wanted to change the currency to partly U.S. dollars & partly Bolivars (in early 2011) \hookrightarrow Also wanted to add 5,000 units
 - Karimi went to Tehran to discuss these changes $\xrightarrow{\text{to Venezuela also}}$
 - ~~Was going to~~ back to Venezuela (Tehari was supposed to go ~~with~~, but he died)
 - Feb. 28, 2011
 - Stayed for his funeral and then returned to Venezuela
 - Did not agree to the Bolivar payment proposal in 2011
- In late 2013, addendum to the contract was agreed to - part payments in Bolivar
 - Issued invoices monthly
 - 55% in Bolivars (at 6.3 exchange rate)
 - 45% in U.S. dollars - but would reduce this by the payment made at the outset
 - [Received 35% of total payment at the outset of the project]
- When Karimi left, around \$22 million was still owed for the project
- The management team in Venezuela were paid in U.S. dollars
- Last time in Iran was 2015
 - Immigrated to Canada in 2014
- Karimi left Venezuela in Sept. 2014 - stopped working for Stratus
 - Only went to Iran for work once b/t 2009 & 2014 - (in 2011)
 - Went to Iran 2-3 times during that time for vacation
- Is involved with construction in Canada and a daycare business

Ali Sadr's role - was the financial manager on the Venezuela project

- Became involved in late 2010

- Karimi submitted budgets and A. Sadr provided the funding

- A. Sadr made the payments to the accounts Karimi needed to run the project

- A. Sadr was responsible for collecting the payments from DUCOLSA

- Submitted invoices to DUCOLSA (w/ a progress report)

↳ Also contained bank information

↳ Karimi signed the invoices that were submitted to DUCOLSA

- Showed: Bates # 1577 - that is an invoice signed by Karimi

- Does not know where A. Sadr was based

- Came to Venezuela 3-4 times to check on how the project was progressing

- Bates # 1923 - showed to Karimi

- Does not recognize the document

Did not discuss sanctions in the Venezuela Committee meetings that he participated in

- IIHC's name was not officially changed - did not notify DUCOLSA of the name change - does recall that IIHC changed its name once in Iran but thinks it reverted back

- It was mentioned in one of the Venezuela Committee meetings that the abbreviation should be used instead of the full name (IIHC) - both M. Sadr and A. Sadr gave this instruction (around 2011 or 2012)

- Karimi did not know why this instruction was given

- Karimi knew about the existence of sanctions against Iran - but did not know the details - did not think private companies or people were subject to sanctions at the time

- Had difficulty receiving his pay in dollars - took longer

- His bank account was closed by T.D. Bank - says he did not know why

- Bates # 951 - showed email to Karimi

- [bKarimi_66@yahoo.com - 51@yahoo.com] Used these personal email accounts

- Seldom used his Stratus email - does not remember the address

- Mainly used his two yahoo accounts while in Venezuela

7/7

Bates #951 - Does not recognize the email

- Did not have a financial relationship w/ A. Sadr at that time

Asked about the Stratess + IHC email addresses under Karimi's name

- Acknowledges that he had email addresses for these companies
- Does not recall using the accounts (if he did use them, only did so rarely)

Bates #950 - Showed document

Bates #2549 - showed document

- Acknowledges sending this email - Jalil Zargoosh was his representative (power of attorney)
- Acknowledges seeing the attachment. - Said he thought TD Bank was being more conservative in deciding to close his account
- Mr. Amini was his immigration representative (consultant)

EXHIBIT F

Re: Karimi Interview

Miller, Ann M. (OT) (FBI)

Thu 2/6/2020 10:54 AM

To: Depresco, Robert J. (NY) (FBI) <rjdepresco@fbi.gov>; Pond, Leigh Ann E. (NY) (FBI) <lepond@fbi.gov>;

Copy. Thanks. I just got it Tuesday as the one she had sent over to my office never made it. We will get it out to you guys.

Ann M. Miller
FBI Assistant Legal Attaché
U.S. Consulate Vancouver
Office | 604-694-6527 Cell | 901-305-2054
Email | ammiller@fbi.gov

From: Depresco, Robert J. (NY) (FBI) <rjdepresco@fbi.gov>
Sent: Thursday, February 6, 2020 7:53 AM
To: Pond, Leigh Ann E. (NY) (FBI) <lepond@fbi.gov>; Miller, Ann M. (OT) (FBI) <ammiller@fbi.gov>
Subject: Re: Karimi Interview

FBI NY
26 Federal Plaza
23rd floor
Attn: SA Pond
New York, NY 10278

Robert DePresco
Special Agent - FBI New York
212.384.1322(O)
646.285.4782(M)

On Feb 6, 2020 10:51 AM, "Miller, Ann M. (OT) (FBI)" <ammiller@fbi.gov> wrote:
Robert and Leigh Ann-

I have the recording from the interview on Jan 22nd. What is a good address to FedEx it to you guys.

Thanks, Ann

Ann M. Miller
FBI Assistant Legal Attaché
U.S. Consulate Vancouver
Office | 604-694-6527 Cell | 901-305-2054
Email | ammiller@fbi.gov

From: Depresco, Robert J. (NY) (FBI) <rjdepresco@fbi.gov>

Sent: Thursday, February 6, 2020 5:56 AM

To: Christine LARSEN <Christine.LARSEN@rcmp-grc.gc.ca>; Miller, Ann M. (OT) (FBI) <ammiller@fbi.gov>; Pond, Leigh Ann E. (NY) (FBI) <lepond@fbi.gov>

Subject: RE: Karimi Interview

Hi Christine,

Would you be able to check and see if there are recordings available from the previous interviews that took place with Karimi on September 14, 2016 and June 16, 2016?

Thank you,

Robert DePresco

Special Agent

Federal Bureau of Investigation – New York

Desk: 212.384.1322

Cell: 646.285.4782

From: Christine LARSEN [mailto:Christine.LARSEN@rcmp-grc.gc.ca]

Sent: Friday, January 24, 2020 1:52 PM

To: Miller, Ann M. (OT) (FBI) <ammiller@fbi.gov>; Pond, Leigh Ann E. (NY) (FBI) <lepond@fbi.gov>

Cc: Depresco, Robert J. (NY) (FBI) <rjdepresco@fbi.gov>; Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>; Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>

Subject: Re: Karimi Interview

Good morning Ann,

Yes I will courier the dvd statement to your office in Vancouver. Thank you!

Christine

Cst. Christine LARSEN #51783

"E" Division Foreign & Domestic Liaison Unit (FDLU) / *Groupe des Liaisons Nationales et Internationales (GLNI)*

Mailstop #205 - 14200 Green Timbers Way, Surrey, BC, V3T 6P3

Tel/Tél: 778-290-5035

christine.larsen@rcmp-grc.gc.ca

>>> "Miller, Ann M. (OT) (FBI)" <ammiller@fbi.gov> 2020/01/23 3:28 PM >>>

Christine-

If it is easier for you, you can give it to me and I can send to New York. Just let me know.

Ann

Ann M. Miller

FBI Assistant Legal Attaché

U.S. Consulate Vancouver

Office | 604-694-6527 Cell | 901-305-2054

Email | ammiller@fbi.gov

From: Pond, Leigh Ann E. (NY) (FBI) <lepond@fbi.gov>

Sent: Thursday, January 23, 2020 3:26 PM

To: Christine LARSEN <Christine.LARSEN@rcmp-grc.gc.ca>; Miller, Ann M. (OT) (FBI) <ammiller@fbi.gov>

Cc: Depresco, Robert J. (NY) (FBI) <rjdepresco@fbi.gov>; Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>; Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>

Subject: Re: Karimi Interview

Yes, please. Our address is:

FBI New York
Attn: SA Pond
26 Federal Plaza, 23rd Floor
New York, NY 10278

Thanks!

-

On Jan 23, 2020 1:37 PM, Christine LARSEN <Christine.LARSEN@rcmp-grc.gc.ca> wrote:

I hope you all have uneventful travel days and sincere apologies for the rain!

Please advise if you would like a copy of the interview recording from yesterday and advise where I should courier it to. It was a pleasure meeting you all.

Regards,

Cst. Christine LARSEN #51783

"E" Division Foreign & Domestic Liaison Unit (FDLU) / *Groupe des Liaisons Nationales et Internationales (GLNI)*

Mailstop #205 - 14200 Green Timbers Way, Surrey, BC, V3T 6P3

Tel/Tél: 778-290-5035

EDIV_FOREIGN_LIAISON@rcmp-grc.gc.ca

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>>> "Pond, Leigh Ann E. (NY) (FBI)" <lepond@fbi.gov> 2020/01/22 4:37 PM >>>

Hello,

Based on today's interview, we will not be continuing the interview tomorrow.

Christine, thank you for your time and adaptability with today's evolving goals. Hopefully this means you get your morning back tomorrow. It was a pleasure working with you today. Our New York team will be departing Canada tomorrow instead of Friday.

Ann, Rob and I will be leaving Canada tomorrow night instead of Friday. We will send an updated itinerary.

John and Jenny, Rob and I will send additional details shortly.

Thank you everyone for all the efforts and accommodations for this trip.

Leigh Ann

-

EXHIBIT G

Krouse, Michael (USANYS)

From: Krouse, Michael (USANYS)
Sent: Wednesday, February 5, 2020 1:23 PM
To: Heberlig, Brian; Weingarten, Reid; Silverman, Nicholas; Bishop, Bruce; Fragale, David
Cc: Kim, Jane (USANYS) 4; Lake, Stephanie (USANYS); LynchG@dany.nyc.gov
Subject: Karimi interview notes and reports
Attachments: 3501-01 2016_06_16 Karimi 302_Redacted.pdf; 3501-02 2016_06_16 Karimi Interview Handwritten notes_Redacted.pdf; 3501-03 2016_09_14 Karimi interview notes.pdf; 3501-04 2019_10_21 Call with Karimi.pdf; 3501-05 2020_1_22 Karimi Proffer Notes.pdf; 3501-06 2016_09_14 Karimi 302_Redacted.pdf

Brian,

I misspoke earlier—there were two prior interviews of Karimi before the interview on January 22, 2020 (so three total). Those two prior interviews were conducted on June 16, 2016 and September 14, 2016. Our understanding is that they were not recorded. The third interview (on January 22, 2020) was recorded, but RCMP has not yet provided us with a copy.

Accordingly, please find attached six documents which are being produced subject to the terms of the protective order: (1) the 302 report of the June 16, 2016 interview; (2) handwritten notes of the June 16, 2016 interview; (3) handwritten notes of the September 14, 2016 interview; (4) notes of a brief coordination call with Karimi on October 21, 2019; (5) handwritten notes of the January 22, 2020 interview; and (6) the 302 report of the September 14, 2016 interview.

Best regards,

Michael

Michael Krouse
Assistant United States Attorney
Southern District of New York
One St. Andrew's Plaza
New York, NY 10007
(212) 637-2279

From: Heberlig, Brian <BHeberlig@steptoe.com>
Sent: Wednesday, February 5, 2020 10:23 AM
To: Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; Weingarten, Reid <RWeingarten@steptoe.com>; Silverman, Nicholas <nsliverman@steptoe.com>; Bishop, Bruce <BBishop@steptoe.com>; Fragale, David <DFragale@steptoe.com>
Cc: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; LynchG@dany.nyc.gov
Subject: RE: U.S. v. Sadr

Thanks, Michael. This draft of the Protective Order is okay with us. -Brian

From: Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>
Sent: Wednesday, February 5, 2020 10:05 AM
To: Heberlig, Brian <BHeberlig@steptoe.com>; Weingarten, Reid <RWeingarten@steptoe.com>; Silverman, Nicholas <nsliverman@steptoe.com>; Bishop, Bruce <BBishop@steptoe.com>; Fragale, David <DFragale@steptoe.com>

Cc: Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>; Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>;

LynchG@dany.nyc.gov

Subject: RE: U.S. v. Sadr

Brian,

Here is a revised protective order along the lines you suggested. There were two interviews of Karimi, and we will produce the notes and reports from both meetings. Our understanding is that the first interview was not recorded. The second interview was, and we will provide you with a copy once we have it.

Michael

Michael Krouse
Assistant United States Attorney
Southern District of New York
One St. Andrew's Plaza
New York, NY 10007
(212) 637-2279

From: Heberlig, Brian <BHeberlig@steptoe.com>

Sent: Wednesday, February 5, 2020 6:45 AM

To: Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; Weingarten, Reid <RWeingarten@steptoe.com>; Silverman,

Nicholas <nsilverman@steptoe.com>; Bishop, Bruce <BBishop@steptoe.com>; Fragale, David <DFragale@steptoe.com>

Cc: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; LynchG@dany.nyc.gov

Subject: RE: U.S. v. Sadr

Michael,

Thanks for your response. Can you confirm that the government plans to produce information regarding all of Mr. Karimi's interviews, not limited to the most recent interview? Also, our request encompassed all recordings, 302 memoranda, and notes. Can you also confirm that you will produce all such materials? In particular, please confirm that you will produce the recording of the interview once you receive it from the Canadian authorities. If you decline to produce any of these materials, please let us know today so we can bring the issue to the Court's attention for the Monday conference.

We do not believe a protective order is necessary and do not intend to "disseminate" the 3500 materials beyond normal use in defending our client. However, if you insist upon an order, we cannot agree to the form of the order because it unfairly restricts our ability to defend our client. The order would need to be expanded to allow us to disclose 3500 materials to: (a) expert witnesses, investigators, expert advisors, consultants and vendors; (b) prospective witnesses, and their counsel; and (c) such other persons as may be authorized by agreement, in writing, of the parties or by the Court upon the defendant's motion. If you are unwilling to revise the protective order in this manner, we agree to abide by the terms of your draft order until the Court can resolve this dispute. Given that the Karimi materials are relevant to

pending motions in limine that may be addressed by the Court on Monday, we request that you produce them immediately subject to our agreement not to further disseminate them beyond the defense team and the defendant until the Court can resolve the protective order issue.

Best, Brian

Brian M. Heberlig

Partner

bheberlig@steptoe.com

Steptoe

+1 202 429 8134 direct
+1 202 368 7855 mobile
+1 202 429 3902 fax

Steptoe & Johnson LLP
1330 Connecticut Avenue, NW
Washington, DC 20036
www.steptoe.com

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From: Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>

Sent: Tuesday, February 4, 2020 8:21 PM

To: Heberlig, Brian <BHeberlig@steptoe.com>; Weingarten, Reid <RWeingarten@steptoe.com>; Silverman, Nicholas <nsilverman@steptoe.com>; Bishop, Bruce <BBishop@steptoe.com>; Fragale, David <DFragale@steptoe.com>

Cc: Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>; Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>; LynchG@dany.nyc.gov

Subject: RE: U.S. v. Sadr

Brian,

Thank you for your letter. We are prepared to provide you with the notes of interviews with Bahram Karimi subject to a protective order. To that end, do you consent to the attached order for 3500 materials (and other witness interview notes)? If you consent, we will ask Judge Nathan to sign the order.

Thank you,

Michael Krouse
Assistant United States Attorney
Southern District of New York
One St. Andrew's Plaza
New York, NY 10007
(212) 637-2279

From: Heberlig, Brian <BHeberlig@steptoe.com>

Sent: Monday, February 3, 2020 7:49 AM

To: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; LynchG@dany.nyc.gov

Cc: Weingarten, Reid <RWeingarten@steptoe.com>; Silverman, Nicholas <nsilverman@steptoe.com>; Bishop, Bruce <BBishop@steptoe.com>; Fragale, David <DFragale@steptoe.com>

Subject: RE: U.S. v. Sadr

Please see the attached letter. -Brian

From: Heberlig, Brian

Sent: Friday, January 31, 2020 12:24 PM

To: 'Kim, Jane (USANYS) 4' <Jane.Kim@usdoj.gov>; Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>; Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>; LynchG@dany.nyc.gov

Cc: Weingarten, Reid <RWeingarten@steptoe.com>; Silverman, Nicholas <nsilverman@steptoe.com>; Bishop, Bruce <BBishop@steptoe.com>; Fragale, David <DFragale@steptoe.com>

Subject: RE: U.S. v. Sadr

Please see the attached letter. -Brian

From: Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>

Sent: Thursday, January 30, 2020 1:09 PM

To: Heberlig, Brian <BHeberlig@steptoe.com>; Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>; Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>; LynchG@dany.nyc.gov

Cc: Weingarten, Reid <RWeingarten@steptoe.com>; Silverman, Nicholas <nsilverman@steptoe.com>; Bishop, Bruce <BBishop@steptoe.com>; Fragale, David <DFragale@steptoe.com>

Subject: RE: U.S. v. Sadr

Counsel:

Please see the attached letter. We are available to meet and confer tomorrow afternoon after 3:45pm, over the weekend, or on Monday between 12 and 2pm.

During our call, we'd like to also discuss stipulations and exhibits. With respect to exhibits, for the pages of documents we expect to use at trial, we need to pull clean, electronic, text-searchable copies of the documents from the discovery produced to you in November 2018. We'd like to complete this process in short order so that we can prepare and produce these documents to you as exhibits in advance of trial. Please let us know if you have any concerns.

Thanks,
Jane

From: Heberlig, Brian <BHeberlig@steptoe.com>

Sent: Wednesday, January 29, 2020 10:25 AM

To: Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; LynchG@dany.nyc.gov; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>

Cc: Weingarten, Reid <RWeingarten@steptoe.com>; Silverman, Nicholas <nsilverman@steptoe.com>; Bishop, Bruce <BBishop@steptoe.com>; Fragale, David <DFragale@steptoe.com>

Subject: U.S. v. Sadr

Please see the attached letter and let us know when you are available to meet and confer. Thanks.

Best, Brian

Brian M. Heberlig
Partner
bheberlig@steptoe.com

Steptoe

+1 202 429 8134 direct **Steptoe & Johnson LLP**
+1 202 368 7855 mobile 1330 Connecticut Avenue, NW
+1 202 429 3902 fax Washington, DC 20036
www.steptoe.com

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EXHIBIT H

Krouse, Michael (USANYS)

From: Pond, Leigh Ann E. (NY) (FBI) <lepond@fbi.gov>
Sent: Wednesday, February 5, 2020 12:14 PM
To: Depresco, Robert J. (NY) (FBI); Krouse, Michael (USANYS)
Cc: Lynch, Garrett; Kim, Jane (USANYS) 4; Lake, Stephanie (USANYS)
Subject: RE: Karimi written notes

Sorry that was a fast response, Bill Wikstrom also said negative on the recording for the previous interviews.

-

On Feb 5, 2020 12:07 PM, "Krouse, Michael (USANYS)" <Michael.Krouse@usdoj.gov> wrote:
Great, thanks!

From: Pond, Leigh Ann E. (NY) (FBI) <lepond@fbi.gov>
Sent: Wednesday, February 5, 2020 12:05 PM
To: Depresco, Robert J. (NY) (FBI) <rjdepresco@fbi.gov>; Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>
Cc: Lynch, Garrett <LynchG@dany.nyc.gov>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Lake, Stephanie (USANYS) <SLake@usa.doj.gov>
Subject: RE: Karimi written notes

Just spoke to SA Denk. No recording on the previous interviews. I'll get the 302 to you.

-

On Feb 5, 2020 12:00 PM, "Krouse, Michael (USANYS)" <Michael.Krouse@usdoj.gov> wrote:
Thanks! Can you send me the 302 from the 9/14/16 interview? We don't have that one.

Also, can we request the audio recordings from the June and September 2016 interviews?

From: Pond, Leigh Ann E. (NY) (FBI) <lepond@fbi.gov>
Sent: Wednesday, February 5, 2020 11:58 AM
To: Depresco, Robert J. (NY) (FBI) <rjdepresco@fbi.gov>; Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>
Cc: Lynch, Garrett <LynchG@dany.nyc.gov>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Lake, Stephanie (USANYS) <SLake@usa.doj.gov>
Subject: RE: Karimi written notes

1. There IS a 302 for 9/14/16
2. Confirmed
3. We don't have audio recordings. RCMP probably does.
4. Confirmed

- On Feb 5, 2020 10:41 AM, "Krouse, Michael (USANYS)" <Michael.Krouse@usdoj.gov> wrote:

>
> Leigh Ann and Rob,
>
> Please confirm as soon as possible:
>
> 1) There is no 302 for the September 14, 2016 interview with Karimi.
>
> 2) There is no 302 for the January 22, 2020 interview with Karimi.
>
> 3) There are no audio recordings of the interviews in June or September of 2016.
>
> 4) We have not yet received the audio recording of the January 22, 2020 interview.
>

> Thanks,

>
> Mike
>

> -----Original Message-----

> From: Pond, Leigh Ann E. (NY) (FBI) <lepond@fbi.gov>
> Sent: Wednesday, January 29, 2020 4:35 PM
> To: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>;
Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Lynch, Garrett <LynchG@dany.nyc.gov>
> Cc: Denk, Benjamin (CTD) (FBI) <bdenk@fbi.gov>
> Subject: Karimi written notes

>
>
>
> Leigh Ann Pond
> Special Agent | New York
> Federal Bureau of Investigation
> 212-384-3650
>
>

EXHIBIT I

Krouse, Michael (USANYS)

From: Truono, Matthew E. (NY) (FBI) <metruono@FBI.GOV>
Sent: Wednesday, February 5, 2020 12:18 PM
To: Krouse, Michael (USANYS)
Cc: Pond, Leigh Ann E. (NY) (FBI)
Subject: Interviews
Attachments: Interview_of_Bahram_Karimi_on_06_16_06.pdf; Interview_of_BAHRAM_KARIMI_on_09_14_16.pdf

Hey Mike,

Here are the two interviews of Bahram Karimi, both from 2016.

Let me know if you need anything else.

Thanks.

Matthew Truono
FBI New York
Mobile: (917) 992-7167
Desk: (212) 384-1716

EXHIBIT J

Call with Karimi

Leigh Ann Pond, SA

Stephanie Lake, Jane Kim, AUSAs

Farsi Interpreter Sepideh Moussavi, 646-321-2746

#

Understand Karimi would like a US based attorney. Karimi says yes. We will reach out to the court and an attorney will reach out to him this week for an appointment of counsel by phone.

Karimi understood the conversation in English, but we had a Farsi interpreter in case.

EXHIBIT K

From: Miller, Ann M. (OT) (FBI) <ammiller@fbi.gov>
Sent: Tuesday, March 31, 2020 12:18 PM
To: Depresco, Robert J. (NY) (FBI)
Subject: Fwd: Tracking# 777707424790 - Delivered 2/11/2020

See below.

Ann M. Miller
Assistant Legal Attaché
U.S. Consulate-Vancouver
Office: 604-694-6527
Cell: 901-305-2054
Email: ammiller@fbi.gov

----- Forwarded message -----

From: "Bailey, Lillian (CTD) (FBI)" <lbailey@fbi.gov>
Date: Mar 31, 2020 9:16 AM
Subject: Fwd: Tracking# 777707424790 - Delivered 2/11/2020
To: "Miller, Ann M. (OT) (FBI)" <ammiller@fbi.gov>
Cc:

-

----- Forwarded message -----

From: Lillian Bailey <limaba321@gmail.com>
Date: Mar 31, 2020 9:16 AM
Subject: Tracking# 777707424790 - Delivered 2/11/2020
To: "Bailey, Lillian (CTD) (FBI)" <lbailey@fbi.gov>
Cc:

Tracking ID Details

[Back](#)

Tracking ID Summary

[Help](#) Hide

Billing Information

Tracking ID no.	777707424790
Invoice no.	5-059-49228
Account no.	9517-3575-2
Bill date	02/07/2020
Total Billed	\$23.24
Tracking ID Balance due	\$0.00
Status	Paid CC

Messages

Distance Based Pricing, Zone 8
 Fuel Surcharge - FedEx has applied a fuel surcharge [Read More..](#)

[View Invoice History](#)[View Signature Proof of Delivery](#)

Transaction Details

[Help](#) Hide

Sender Information

Lillian Bailey
 US Consulate Vancouver
 701 Harrison Ave
 Unit 8200
 BLAINE WA 98231
 US

Recipient Information

SA Leigh Ann Pond
 FBI New York
 26 Federal Plaza
 23rd floor
 NEW YORK NY 10278
 US

Shipment Details

Ship date	02/07/2020
Tendered date	02/07/2020
Payment type	Shipper
Service type	FedEx Express Saver
Zone	08
Package type	FedEx Pak
Rated weight	1.00lbs
Pieces	1
Rated method	1
Meter no.	112241249
Declared value	\$0.00

Charges

Transportation Charge	25.92
Fuel Surcharge	1.47
Discount	-4.15
Total charges	\$23.24

[TRACK ANOTHER SHIPMENT](#)777707424790 

Delivered
 Tuesday 2/11/2020 at 10:06 am



DELIVERED

Signed for by: L.CAMPORALE

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Is your delivery already on its way?

EXHIBIT L

Krouse, Michael (USANYS)

From: Depresco, Robert J. (NY) (FBI) <rjdepresco@fbi.gov>
Sent: Tuesday, February 18, 2020 10:57 PM
To: Miller, Ann M. (OT) (FBI)
Subject: RE: Karimi Interview

Sorry leigh ann got it already. I just caught up with her earlier today.

Thanks

Robert DePresco
Special Agent - FBI New York
212.384.1322(O)
646.285.4782(M)

On Feb 18, 2020 1:19 PM, "Miller, Ann M. (OT) (FBI)" <ammiller@fbi.gov> wrote:

Yes and we sent it via FedEx. You should have it soon.

Ann M. Miller
Assistant Legal Attaché
U.S. Consulate-Vancouver
Office: 604-694-6527
Cell: 901-305-2054
Email: ammiller@fbi.gov

On Feb 18, 2020 10:12 AM, "Depresco, Robert J. (NY) (FBI)" <rjdepresco@fbi.gov> wrote:

| I spoke to Sgroi he said doing the email instead of FDR should be fine.

Did you receive the other recording from Christine yet?

Robert DePresco
Special Agent
Federal Bureau of Investigation – New York
Desk: 212.384.1322
Cell: 646.285.4782

From: Miller, Ann M. (OT) (FBI)
Sent: Saturday, February 15, 2020 9:44 PM
To: Pond, Leigh Ann E. (NY) (FBI) <lepond@fbi.gov>; Depresco, Robert J. (NY) (FBI) <rjdepresco@fbi.gov>
Subject: RE: Karimi Interview

I think we will need to send them an FDR and request it.

Ann M. Miller
Assistant Legal Attaché
U.S. Consulate-Vancouver
Office: 604-694-6527
Cell: 901-305-2054
Email: ammiller@fbi.gov

On Feb 15, 2020 6:03 PM, "Depresco, Robert J. (NY) (FBI)" <rjdepresco@fbi.gov> wrote:

Will do, thank you for getting back to us.

Robert DePresco
Special Agent - FBI New York
212.384.1322(O)
646.285.4782(M)

On Feb 15, 2020 7:46 PM, Christine LARSEN <Christine.LARSEN@rcmp-grc.gc.ca> wrote:
Hi Robert,

I finally received a response from E Div INSET as it was their member who assisted with the previous interviews with KARIMI. They have advised of the following procedure:

"EINSET is required to go through Federal Police National Security (FPNS) for these requests. At this time FDLU will need to advise US DOJ that US DOJ will need to make the request direct to FPNS. Then FPNS will review the file and task EINSET as appropriate."

Please email your request to Federal Policing Intake Unit at [Federal Policing Intake Unit@rcmp-grc.gc.ca](mailto:Federal_Policing_Intake_Unit@rcmp-grc.gc.ca) but address your request to the Federal Policing National Security (FPNS).

The related file number for EINSET is **SPROS 2016375**. Let me know if you need any further assistance.

Regards,

Christine

Cst. Christine LARSEN #51783

"E" Division Foreign & Domestic Liaison Unit (FDLU) / *Groupe des Liaisons Nationales et Internationales (GLNI)*

Mailstop #205 - 14200 Green Timbers Way, Surrey, BC, V3T 6P3

Tel/Tél: 778-290-5035

EDIV_FOREIGN_LIAISON@rcmp-grc.gc.ca

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>>> "Depresco, Robert J. (NY) (FBI)" <rjdepresco@fbi.gov> 2020/02/06 5:56 AM >>>

Hi Christine,

Would you be able to check and see if there are recordings available from the previous interviews that took place with Karimi on September 14, 2016 and June 16, 2016?

Thank you,

Robert DePresco
Special Agent
Federal Bureau of Investigation – New York
Desk: 212.384.1322
Cell: 646.285.4782

From: Christine LARSEN [mailto:Christine.LARSEN@rcmp-grc.gc.ca]

Sent: Friday, January 24, 2020 1:52 PM

To: Miller, Ann M. (OT) (FBI) <ammiller@fbi.gov>; Pond, Leigh Ann E. (NY) (FBI) <lepond@fbi.gov>

Cc: Depresco, Robert J. (NY) (FBI) <rjdepresco@fbi.gov>; Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>; Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>

Subject: Re: Karimi Interview

Good morning Ann,

Yes I will courier the dvd statement to your office in Vancouver. Thank you!

Christine

Cst. Christine LARSEN #51783

"E" Division Foreign & Domestic Liaison Unit (FDLU) / *Groupe des Liaisons Nationales et Internationales (GLNI)*

Mailstop #205 - 14200 Green Timbers Way, Surrey, BC, V3T 6P3

Tel/Tél: 778-290-5035

christine.larsen@rcmp-grc.gc.ca

>>> "Miller, Ann M. (OT) (FBI)" <ammiller@fbi.gov> 2020/01/23 3:28 PM >>>

Christine-

If it is easier for you, you can give it to me and I can send to New York. Just let me know.

Ann

Ann M. Miller

FBI Assistant Legal Attaché

U.S. Consulate Vancouver

Office | 604-694-6527 Cell | 901-305-2054

Email | ammiller@fbi.gov

From: Pond, Leigh Ann E. (NY) (FBI) <lepond@fbi.gov>

Sent: Thursday, January 23, 2020 3:26 PM

To: Christine LARSEN <Christine.LARSEN@rcmp-grc.gc.ca>; Miller, Ann M. (OT) (FBI) <ammiller@fbi.gov>

Cc: Depresco, Robert J. (NY) (FBI) <rjdepresco@fbi.gov>; Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>; Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>

Subject: Re: Karimi Interview

Yes, please. Our address is:

FBI New York
Attn: SA Pond
26 Federal Plaza, 23rd Floor
New York, NY 10278

Thanks!

On Jan 23, 2020 1:37 PM, Christine LARSEN <Christine.LARSEN@rcmp-grc.gc.ca> wrote:
I hope you all have uneventful travel days and sincere apologies for the rain!

Please advise if you would like a copy of the interview recording from yesterday and advise where I should courier it to. It was a pleasure meeting you all.

Regards,

Cst. Christine LARSEN #51783

"E" Division Foreign & Domestic Liaison Unit (FDLU) / *Groupe des Liaisons Nationales et Internationales (GLNI)*

Mailstop #205 - 14200 Green Timbers Way, Surrey, BC, V3T 6P3

Tel/Tél: 778-290-5035

EDIV_FOREIGN_LIAISON@rcmp-grc.gc.ca

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>>> "Pond, Leigh Ann E. (NY) (FBI)" <lepond@fbi.gov> 2020/01/22 4:37 PM >>>

Hello,

Based on today's interview, we will not be continuing the interview tomorrow.

Christine, thank you for your time and adaptability with today's evolving goals. Hopefully this means you get your morning back tomorrow. It was a pleasure working with you today. Our New York team will be departing Canada tomorrow instead of Friday.

Ann, Rob and I will be leaving Canada tomorrow night instead of Friday. We will send an updated itinerary.

John and Jenny, Rob and I will send additional details shortly.

Thank you everyone for all the efforts and accommodations for this trip.

Leigh Ann

-

EXHIBIT M

Krouse, Michael (USANYS)

From: Krouse, Michael (USANYS)
Sent: Tuesday, February 18, 2020 1:26 PM
To: Depresco, Robert J. (NY) (FBI)
Cc: Kim, Jane (USANYS) 4; Lake, Stephanie (USANYS)
Subject: RE: FBI New York Request to FPNS

Great, thanks!

-----Original Message-----

From: Depresco, Robert J. (NY) (FBI) <rjdepresco@fbi.gov>
Sent: Tuesday, February 18, 2020 1:13 PM
To: Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>
Cc: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Lake, Stephanie (USANYS) <SLake@usa.doj.gov>
Subject: RE: FBI New York Request to FPNS

It is in transit, still waiting for it.

Robert DePresco
Special Agent
Federal Bureau of Investigation - New York
Desk: 212.384.1322
Cell: 646.285.4782

-----Original Message-----

From: Krouse, Michael (USANYS) [mailto:Michael.Krouse@usdoj.gov]
Sent: Tuesday, February 18, 2020 12:38 PM
To: Depresco, Robert J. (NY) (FBI) <rjdepresco@fbi.gov>
Cc: Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>; Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>
Subject: RE: FBI New York Request to FPNS

What about the January 2020 meeting?

-----Original Message-----

From: Depresco, Robert J. (NY) (FBI) <rjdepresco@fbi.gov>
Sent: Tuesday, February 18, 2020 11:18 AM
To: Federal_Policing_Intake_Unit@rcmp-grc.gc.ca
Cc: Miller, Ann M. (OT) (FBI) <ammiller@fbi.gov>; Pond, Leigh Ann E. (NY) (FBI) <lepond@fbi.gov>; Sgroi, Johnarthur (CD) (FBI) <jasgroi@fbi.gov>; Jones, Christopher D. (OT) (FBI) <cdjones5@fbi.gov>; EDIV_FOREIGN_LIAISON@rcmp-grc.gc.ca; Christine LARSEN <Christine.LARSEN@rcmp-grc.gc.ca>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; McReynolds, Jennifer A. (NY) (FBI) <jamcreynolds@fbi.gov>
Subject: FBI New York Request to FPNS

Hello,

FBI New York respectfully requests assistance from the Federal Policing National Security in obtaining the recordings from a joint interview between FBI New York and RCMP on September 14, 2016 and June 16, 2016 in Vancouver, BC. The interviews were with Canadian citizen, Bahram KARIMI and included a member from E Div INSET.

File Number for EINSET is SPROS 2016375.

Assistant United States Attorneys, Michael Krouse and Jane Kim (cc'd here), represent US DOJ and concur with this request. If you require this request to be on an official memo please let me know.

Thank you in advance for your cooperation,

Robert DePresco
Special Agent
Federal Bureau of Investigation - New York
Desk: 212.384.1322
Cell: 646.285.4782

EXHIBIT N

From: Sgroi, Johnarthur (CD) (FBI) <jasgroi@fbi.gov>
Sent: Friday, February 21, 2020 7:53 AM
To: Depresco, Robert J. (NY) (FBI); Federal_Policing_Intake_Unit@rcmp-grc.gc.ca
Cc: Miller, Ann M. (OT) (FBI); Pond, Leigh Ann E. (NY) (FBI); Jones, Christopher D. (OT) (FBI); EDIV_FOREIGN_LIAISON@rcmp-grc.gc.ca; Christine LARSEN; Kim, Jane (USANYS) 4; Krouse, Michael (USANYS); McReynolds, Jennifer A. (NY) (FBI)
Subject: RE: FBI New York Request to FPNS

Good morning RCMP,

I am following up on Special Agent Depresco's email (see below) to obtain recordings from joint RCMP-FBI interviews which took place in BC in 2016. If there is anything I can do from FBI Headquarters to assist your agency in getting these recordings, please advise.

Thank you,

John

JohnArthur Sgroi
Supervisory Special Agent
Global Technology Transfer Unit
Federal Bureau of Investigation
202-323-9752 desk
646-438-1973 mobile

-----Original Message-----

From: Depresco, Robert J. (NY) (FBI)
Sent: Tuesday, February 18, 2020 11:18 AM
To: Federal_Policing_Intake_Unit@rcmp-grc.gc.ca
Cc: Miller, Ann M. (OT) (FBI) <ammiller@fbi.gov>; Sgroi, Johnarthur (CD) (FBI) <jasgroi@fbi.gov>; Jones, Christopher D. (OT) (FBI) <cdjones5@fbi.gov>; EDIV_FOREIGN_LIAISON@rcmp-grc.gc.ca; Christine LARSEN <Christine.LARSEN@rcmp-grc.gc.ca>; Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>; Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>; McReynolds, Jennifer A. (NY) (FBI) <jamcreynolds@fbi.gov>
Subject: FBI New York Request to FPNS

Hello,

FBI New York respectfully requests assistance from the Federal Policing National Security in obtaining the recordings from a joint interview between FBI New York and RCMP on September 14, 2016 and June 16, 2016 in Vancouver, BC. The interviews were with Canadian citizen, Bahram KARIMI and included a member from E Div INSET.

File Number for EINSET is SPROS 2016375.

Assistant United States Attorneys, Michael Krouse and Jane Kim (cc'd here), represent US DOJ and concur with this request. If you require this request to be on an official memo please let me know.

Thank you in advance for your cooperation,

Robert DePresco
Special Agent
Federal Bureau of Investigation - New York
Desk: 212.384.1322
Cell: 646.285.4782

EXHIBIT O

From: Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>
Sent: Sunday, February 23, 2020 5:33 PM
To: Heberlig, Brian; Krouse, Michael (USANYS); Weingarten, Reid; Silverman, Nicholas; Bishop, Bruce; Fragale, David
Cc: Lake, Stephanie (USANYS); LynchG@dany.nyc.gov
Subject: RE: Karimi interview notes and reports

The FBI has requested the recordings from Canada's RCMP, but we have not yet received them. Any recordings that we receive from Canada will be promptly produced to you.

From: Heberlig, Brian <BHeberlig@steptoe.com>
Sent: Sunday, February 23, 2020 5:30 PM
To: Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; Weingarten, Reid <RWeingarten@steptoe.com>; Silverman, Nicholas <nsilverman@steptoe.com>; Bishop, Bruce <BBishop@steptoe.com>; Fragale, David <DFragale@steptoe.com>
Cc: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; LynchG@dany.nyc.gov
Subject: RE: Karimi interview notes and reports

Counsel:

We are writing to renew our request for the recording of the Karimi interview in Canada. Please let us know if we will receive it this week. We would prefer not to file a motion to compel but may need to do so if we can't get an assurance that it will be provided promptly.

Thank you.

Brian

From: Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>
Sent: Wednesday, February 5, 2020 1:23 PM
To: Heberlig, Brian <BHeberlig@steptoe.com>; Weingarten, Reid <RWeingarten@steptoe.com>; Silverman, Nicholas <nsilverman@steptoe.com>; Bishop, Bruce <BBishop@steptoe.com>; Fragale, David <DFragale@steptoe.com>
Cc: Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>; Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>; LynchG@dany.nyc.gov
Subject: Karimi interview notes and reports

Brian,

I misspoke earlier—there were two prior interviews of Karimi before the interview on January 22, 2020 (so three total). Those two prior interviews were conducted on June 16, 2016 and September 14, 2016. Our understanding is that they were not recorded. The third interview (on January 22, 2020) was recorded, but RCMP has not yet provided us with a copy.

Accordingly, please find attached six documents which are being produced subject to the terms of the protective order: (1) the 302 report of the June 16, 2016 interview; (2) handwritten notes of the June 16, 2016 interview; (3)

handwritten notes of the September 14, 2016 interview; (4) notes of a brief coordination call with Karimi on October 21, 2019; (5) handwritten notes of the January 22, 2020 interview; and (6) the 302 report of the September 14, 2016 interview.

Best regards,

Michael

Michael Krouse
Assistant United States Attorney
Southern District of New York
One St. Andrew's Plaza
New York, NY 10007
(212) 637-2279

From: Heberlig, Brian <BHeberlig@steptoe.com>
Sent: Wednesday, February 5, 2020 10:23 AM
To: Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; Weingarten, Reid <RWeingarten@steptoe.com>; Silverman, Nicholas <nsilverman@steptoe.com>; Bishop, Bruce <BBishop@steptoe.com>; Fragale, David <D_fragale@steptoe.com>
Cc: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; LynchG@dany.nyc.gov
Subject: RE: U.S. v. Sadr

Thanks, Michael. This draft of the Protective Order is okay with us. -Brian

From: Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>
Sent: Wednesday, February 5, 2020 10:05 AM
To: Heberlig, Brian <BHeberlig@steptoe.com>; Weingarten, Reid <RWeingarten@steptoe.com>; Silverman, Nicholas <nsilverman@steptoe.com>; Bishop, Bruce <BBishop@steptoe.com>; Fragale, David <D_fragale@steptoe.com>
Cc: Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>; Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>; LynchG@dany.nyc.gov
Subject: RE: U.S. v. Sadr

Brian,

Here is a revised protective order along the lines you suggested. There were two interviews of Karimi, and we will produce the notes and reports from both meetings. Our understanding is that the first interview was not recorded. The second interview was, and we will provide you with a copy once we have it.

Michael

Michael Krouse
Assistant United States Attorney
Southern District of New York
One St. Andrew's Plaza
New York, NY 10007
(212) 637-2279

From: Heberlig, Brian <BHeberlig@steptoe.com>
Sent: Wednesday, February 5, 2020 6:45 AM

To: Krouse, Michael (USANYS) <MKrouse@usa.doi.gov>; Weingarten, Reid <RWeingarten@steptoe.com>; Silverman, Nicholas <nsilverman@steptoe.com>; Bishop, Bruce <BBishop@steptoe.com>; Fragale, David <DFragale@steptoe.com>
Cc: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; LynchG@dany.nyc.gov
Subject: RE: U.S. v. Sadr

Michael,

Thanks for your response. Can you confirm that the government plans to produce information regarding all of Mr. Karimi's interviews, not limited to the most recent interview? Also, our request encompassed all recordings, 302 memoranda, and notes. Can you also confirm that you will produce all such materials? In particular, please confirm that you will produce the recording of the interview once you receive it from the Canadian authorities. If you decline to produce any of these materials, please let us know today so we can bring the issue to the Court's attention for the Monday conference.

We do not believe a protective order is necessary and do not intend to "disseminate" the 3500 materials beyond normal use in defending our client. However, if you insist upon an order, we cannot agree to the form of the order because it unfairly restricts our ability to defend our client. The order would need to be expanded to allow us to disclose 3500 materials to: (a) expert witnesses, investigators, expert advisors, consultants and vendors; (b) prospective witnesses, and their counsel; and (c) such other persons as may be authorized by agreement, in writing, of the parties or by the Court upon the defendant's motion. If you are unwilling to revise the protective order in this manner, we agree to abide by the terms of your draft order until the Court can resolve this dispute. Given that the Karimi materials are relevant to pending motions in limine that may be addressed by the Court on Monday, we request that you produce them immediately subject to our agreement not to further disseminate them beyond the defense team and the defendant until the Court can resolve the protective order issue.

Best, Brian

Brian M. Heberlig
Partner
bheberlig@steptoe.com

Steptoe

+1 202 429 8134 direct
+1 202 368 7855 mobile
+1 202 429 3902 fax

Steptoe & Johnson LLP
1330 Connecticut Avenue, NW
Washington, DC 20036
www.steptoe.com

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From: Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>

Sent: Tuesday, February 4, 2020 8:21 PM

To: Heberlig, Brian <BHeberlig@steptoe.com>; Weingarten, Reid <RWeingarten@steptoe.com>; Silverman, Nicholas <nsilverman@steptoe.com>; Bishop, Bruce <BBishop@steptoe.com>; Fragale, David <DFragale@steptoe.com>

Cc: Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>; Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>; LynchG@dany.nyc.gov

Subject: RE: U.S. v. Sadr

Brian,

Thank you for your letter. We are prepared to provide you with the notes of interviews with Bahram Karimi subject to a protective order. To that end, do you consent to the attached order for 3500 materials (and other witness interview notes)? If you consent, we will ask Judge Nathan to sign the order.

Thank you,

Michael Krouse
Assistant United States Attorney
Southern District of New York
One St. Andrew's Plaza
New York, NY 10007
(212) 637-2279

From: Heberlig, Brian <BHeberlig@steptoe.com>

Sent: Monday, February 3, 2020 7:49 AM

To: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; LynchG@dany.nyc.gov

Cc: Weingarten, Reid <RWeingarten@steptoe.com>; Silverman, Nicholas <nsilverman@steptoe.com>; Bishop, Bruce <BBishop@steptoe.com>; Fragale, David <DFragale@steptoe.com>

Subject: RE: U.S. v. Sadr

Please see the attached letter. -Brian

From: Heberlig, Brian

Sent: Friday, January 31, 2020 12:24 PM

To: 'Kim, Jane (USANYS) 4' <Jane.Kim@usdoj.gov>; Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>; Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>; LynchG@dany.nyc.gov

Cc: Weingarten, Reid <RWeingarten@steptoe.com>; Silverman, Nicholas <nsilverman@steptoe.com>; Bishop, Bruce <BBishop@steptoe.com>; Fragale, David <DFragale@steptoe.com>

Subject: RE: U.S. v. Sadr

Please see the attached letter. -Brian

From: Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>

Sent: Thursday, January 30, 2020 1:09 PM

To: Heberlig, Brian <BHeberlig@steptoe.com>; Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>; Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>; LynchG@dany.nyc.gov

Cc: Weingarten, Reid <RWeingarten@steptoe.com>; Silverman, Nicholas <nsilverman@steptoe.com>; Bishop, Bruce <BBishop@steptoe.com>; Fragale, David <DFragale@steptoe.com>

Subject: RE: U.S. v. Sadr

Counsel:

Please see the attached letter. We are available to meet and confer tomorrow afternoon after 3:45pm, over the weekend, or on Monday between 12 and 2pm.

During our call, we'd like to also discuss stipulations and exhibits. With respect to exhibits, for the pages of documents we expect to use at trial, we need to pull clean, electronic, text-searchable copies of the documents from the discovery produced to you in November 2018. We'd like to complete this process in short order so that we can prepare and produce these documents to you as exhibits in advance of trial. Please let us know if you have any concerns.

Thanks,
Jane

From: Heberlig, Brian <BHeberlig@steptoe.com>

Sent: Wednesday, January 29, 2020 10:25 AM

To: Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; LynchG@dany.nyc.gov; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>

Cc: Weingarten, Reid <RWeingarten@steptoe.com>; Silverman, Nicholas <nsilverman@steptoe.com>; Bishop, Bruce <BBishop@steptoe.com>; Fragale, David <DFragale@steptoe.com>

Subject: U.S. v. Sadr

Please see the attached letter and let us know when you are available to meet and confer. Thanks.

Best, Brian

Brian M. Heberlig

Partner

bheberlig@steptoe.com

Steptoe

+1 202 429 8134 direct
+1 202 368 7855 mobile
+1 202 429 3902 fax

Steptoe & Johnson LLP
1330 Connecticut Avenue, NW
Washington, DC 20036
www.steptoe.com

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EXHIBIT P

Krouse, Michael (USANYS)

From: Depresco, Robert J. (NY) (FBI) <rjdepresco@fbi.gov>
Sent: Thursday, February 27, 2020 2:19 PM
To: Krouse, Michael (USANYS)
Cc: Kim, Jane (USANYS) 4; Lake, Stephanie (USANYS); Pond, Leigh Ann E. (NY) (FBI)
Subject: RE: FBI New York Request to FPNS

FYI...I heard back from RCMP and they advised they did NOT record the interviews with Karimi in 2016.

Robert DePresco
Special Agent
Federal Bureau of Investigation - New York
Desk: 212.384.1322
Cell: 646.285.4782

-----Original Message-----

From: Krouse, Michael (USANYS) [mailto:Michael.Krouse@usdoj.gov]
Sent: Tuesday, February 18, 2020 1:26 PM
To: Depresco, Robert J. (NY) (FBI) <rjdepresco@fbi.gov>
Cc: Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>; Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>
Subject: RE: FBI New York Request to FPNS

Great, thanks!

-----Original Message-----

From: Depresco, Robert J. (NY) (FBI) <rjdepresco@fbi.gov>
Sent: Tuesday, February 18, 2020 1:13 PM
To: Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>
Cc: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Lake, Stephanie (USANYS) <SLake@usa.doj.gov>
Subject: RE: FBI New York Request to FPNS

It is in transit, still waiting for it.

Robert DePresco
Special Agent
Federal Bureau of Investigation - New York
Desk: 212.384.1322
Cell: 646.285.4782

-----Original Message-----

From: Krouse, Michael (USANYS) [mailto:Michael.Krouse@usdoj.gov]
Sent: Tuesday, February 18, 2020 12:38 PM
To: Depresco, Robert J. (NY) (FBI) <rjdepresco@fbi.gov>
Cc: Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>; Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>
Subject: RE: FBI New York Request to FPNS

What about the January 2020 meeting?

-----Original Message-----

From: Depresco, Robert J. (NY) (FBI) <rjdepresco@fbi.gov>
Sent: Tuesday, February 18, 2020 11:18 AM
To: Federal_Policing_Intake_Unit@rcmp-grc.gc.ca
Cc: Miller, Ann M. (OT) (FBI) <ammiller@fbi.gov>; Pond, Leigh Ann E. (NY) (FBI) <lepond@fbi.gov>; Sgroi, Johnarthur (CD) (FBI) <jasgroi@fbi.gov>; Jones, Christopher D. (OT) (FBI) <cdjones5@fbi.gov>; EDIV_FOREIGN_LIAISON@rcmp-grc.gc.ca; Christine LARSEN <Christine.LARSEN@rcmp-grc.gc.ca>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; McReynolds, Jennifer A. (NY) (FBI) <jamcreynolds@fbi.gov>
Subject: FBI New York Request to FPNS

Hello,

FBI New York respectfully requests assistance from the Federal Policing National Security in obtaining the recordings from a joint interview between FBI New York and RCMP on September 14, 2016 and June 16, 2016 in Vancouver, BC. The interviews were with Canadian citizen, Bahram KARIMI and included a member from E Div INSET.

File Number for EINSET is SPROS 2016375.

Assistant United States Attorneys, Michael Krouse and Jane Kim (cc'd here), represent US DOJ and concur with this request. If you require this request to be on an official memo please let me know.

Thank you in advance for your cooperation,

Robert DePresco
Special Agent
Federal Bureau of Investigation - New York
Desk: 212.384.1322
Cell: 646.285.4782

EXHIBIT Q

Krouse, Michael (USANYS)

From: Depresco, Robert J. (NY) (FBI) <rjdepresco@fbi.gov>
Sent: Monday, March 30, 2020 2:59 PM
To: Krouse, Michael (USANYS)
Cc: Lake, Stephanie (USANYS); Pond, Leigh Ann E. (NY) (FBI); Kim, Jane (USANYS) 4; Lynch, Garrett (USANYS) [Contractor]; Milione, Shawn (USANYS) [Contractor]; McReynolds, Jennifer A. (NY) (FBI)
Subject: RE: Interviewees in Stratus/Sadr

Yes we notified you on 2/18 the audio recording was in transit and realized later that day the audio recording was actually in our squad's possession, an oversight on our end. However, you never communicated to us that you would need that recording as soon as it was received. And before today, none of you ever stated to us that the Judge was told we do not have the recording. Did you notify her of this on 2/18 or sometime after and failed to follow up with us to see if we had it?

Additionally, I emailed you, Kim and Lake on 2/27 stating that RCMP did not record the interviews with Karimi in 2016 and none of you responded to that e-mail following up on the audio from the January 2020 interview. It was logical to think if you needed it, one of you would have communicated that to us at some point since you knew it was in transit over a week prior to this email.

Krouse, you and Kim took notes during that interview. Wasn't that already provided to judge and the defense? The audio is the same evidence, just in a different format. There is no new information.

In the future if there are discussions about what is in the possession of the FBI please communicate with us directly or include us in that conversation.

Robert DePresco
Special Agent
Federal Bureau of Investigation – New York
Desk: 212.384.1322
Cell: 646.285.4782

-----Original Message-----

From: Krouse, Michael (USANYS) [mailto:Michael.Krouse@usdoj.gov]
Sent: Monday, March 30, 2020 2:20 PM
To: Depresco, Robert J. (NY) (FBI) <rjdepresco@fbi.gov>
Cc: Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>; Pond, Leigh Ann E. (NY) (FBI) <lepond@fbi.gov>; Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>; Lynch, Garrett (USANYS) [Contractor] <Garrett.Lynch@usdoj.gov>; Milione, Shawn (USANYS) [Contractor] <Shawn.Milione@usdoj.gov>
Subject: Re: Interviewees in Stratus/Sadr

None of us recall being told that the FBI had the recording, and we don't see any email where you told us you had it. The last email on this topic was from 2/18, when I asked you about the recording, and you said it was "in transit."

So when we explain to the Judge why we told her we did not have the recording, what should we say? It would help to know when exactly you and Leigh Ann became aware that your squad had the recording, and why we weren't informed. If it was an oversight, we can say that, but we need to explain.

Sent from my iPhone

> On Mar 30, 2020, at 1:47 PM, Depresco, Robert J. (NY) (FBI) <rjdepresco@fbi.gov> wrote:

>

> We don't have a record of the exact day. The squad received it on or about 2/10/20.

>

> Robert DePresco

> Special Agent

> Federal Bureau of Investigation – New York

> Desk: 212.384.1322

> Cell: 646.285.4782

>

>

> -----Original Message-----

> From: Krouse, Michael (USANYS) [mailto:Michael.Krouse@usdoj.gov]

> Sent: Monday, March 30, 2020 1:33 PM

> To: Depresco, Robert J. (NY) (FBI) <rjdepresco@fbi.gov>

> Cc: Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>; Pond, Leigh Ann E. (NY) (FBI) <lepond@fbi.gov>; Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>; Lynch, Garrett (USANYS) [Contractor] <Garrett.Lynch@usdoj.gov>; Milione, Shawn (USANYS) [Contractor] <Shawn.Milione@usdoj.gov>

> Subject: Re: Interviewees in Stratus/Sadr

>

> When did you guys get it? Not FBI Legat, your squad.

>

> Sent from my iPhone

>

>> On Mar 30, 2020, at 1:32 PM, Depresco, Robert J. (NY) (FBI) <rjdepresco@fbi.gov> wrote:

>>

>> I do not know the exact date, it was sometime within the week of February 10 that FBI NY received the recording from LEGAT Ottawa.

>>

>> The files are about 160mb and 45mb.

>>

>> Robert DePresco

>> Special Agent

>> Federal Bureau of Investigation - New York

>> Desk: 212.384.1322

>> Cell: 646.285.4782

>>

>>

>> -----Original Message-----

>> From: Lake, Stephanie (USANYS) [mailto:Stephanie.Lake@usdoj.gov]

>> Sent: Monday, March 30, 2020 1:25 PM

>> To: Depresco, Robert J. (NY) (FBI) <rjdepresco@fbi.gov>; Pond, Leigh Ann E. (NY) (FBI) <lepond@fbi.gov>; Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>; Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>; Lynch, Garrett (USANYS) [Contractor] <Garrett.Lynch@usdoj.gov>; Milione, Shawn (USANYS) [Contractor] <Shawn.Milione@usdoj.gov>

>> Subject: RE: Interviewees in Stratus/Sadr

>>

>> When did you guys get it? And how big is each file? You might be able to send it over USAfx.

>>

>> They have post-trial motions (motion for a new trial and motion for a judgment of acquittal) due in about two weeks. They've sent us a number of disclosure-related requests in the meantime, which we're trying to run down.

>>

>> -----Original Message-----

>> From: Depresco, Robert J. (NY) (FBI) <rjdepresco@fbi.gov>

>> Sent: Monday, March 30, 2020 12:53 PM

>> To: Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Pond, Leigh Ann E. (NY) (FBI) <lepond@fbi.gov>; Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>; Milione, Shawn (USANYS) [Contractor] <SMilione@usa.doj.gov>

>> Subject: RE: Interviewees in Stratus/Sadr

>>

>> The Karimi interview is an audio file only (2 files) and both are too large to e-mail over this system. FBI LEGAT Ottawa received the interview recording from RCMP on 2/4/2020.

>>

>> I can copy the disc and drop it at your office if you want.

>>

>> Did the defense officially file an appeal with the court?

>>

>>

>> Thanks,

>>

>> Robert DePresco

>> Special Agent

>> Federal Bureau of Investigation - New York

>> Desk: 212.384.1322

>> Cell: 646.285.4782

>>

>> -----Original Message-----

>> From: Lake, Stephanie (USANYS) [mailto:Stephanie.Lake@usdoj.gov]

>> Sent: Sunday, March 29, 2020 12:26 PM

>> To: Pond, Leigh Ann E. (NY) (FBI) <lepond@fbi.gov>; Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>; Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>; Lynch, Garrett (USANYS) [Contractor] <Garrett.Lynch@usdoj.gov>; Milione, Shawn (USANYS) [Contractor] <Shawn.Milione@usdoj.gov>

>> Cc: Depresco, Robert J. (NY) (FBI) <rjdepresco@fbi.gov>

>> Subject: RE: Interviewees in Stratus/Sadr

>>

>> Thanks Leigh Ann! Any update on the Karimi video?

>>

>> -----Original Message-----

>> From: Pond, Leigh Ann E. (NY) (FBI) <lepond@fbi.gov>

>> Sent: Friday, March 27, 2020 1:35 PM

>> To: Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>; Milione, Shawn (USANYS) [Contractor] <SMilione@usa.doj.gov>

>> Cc: Depresco, Robert J. (NY) (FBI) <rjdepresco@fbi.gov>

>> Subject: Interviewees in Stratus/Sadr

>>

>> Attached is the list of people FBI interviewed in connection with our Stratus/Sadr case. It doesn't include expert witnesses we sat in on interviews with for the trial. For the more obscure ones, I included the unclass 302s in case you don't already have them.

>>

>> Leigh Ann Pond

>> Special Agent | New York

>> Federal Bureau of Investigation

>> 212-384-3650

>>

>>